

CALDERDALE LOCAL PLAN

Representations and Responses Document

Chapter 9 - New Housing Sites:

Northowram & Shelf

Calderdale Metropolitan Borough Council

June 2019



This document contains representations and Council responses for Chapter 9 - Sites for New Housing in Northowram & Shelf

Document Section: Policy SD7 Allocated Housing Sites - Northowram and Shelf

Representations

Comment ID **APX231**

Site ref (if applicable):

Person ID: **1181915**

Name: **Mr Alistair Craven**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such

a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. CONSERVATION/HERITAGE Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets. ACCESSIBILITY The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as "less than 15mins" As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites. SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan.

Additional Evidence Link:

Comment ID **Lpp1201**

Site ref (if applicable):

Person ID: **855708**

Name: **Barratt Homes & David
Wilson Homes**

Organisation: **Barratt Homes & David
Wilson Homes**

Agent ID: **961335**

Name: **Mr Paul Butler**

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

See attachment - PBP Deliverability Assessment - Housing Mixed Use Allocations - providing evidence to support allocation of sites LP0982, LP0773 & LP0177

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5095200>

Comment ID **Lpp151**

Site ref (if applicable):

Person ID: **1171108**

Name: **Mr Brian Crossley (SNLPF)**

Organisation: **Chairperson SNLPF**

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Once away from the major roads passing through the Ward (A6036 and A644); the villages are characterised by large open areas of grassland; given over to stock rearing and criss-crossed by hundreds of dry-stone walls and many small streams. The local road network consists mainly of quiet, narrow lanes bordered by hedgerows and dry-stone walls and often with a single narrow pavement or in many cases no pavement at all. It is this character that is so loved by residents and visitors alike and it is this character that these proposals seek to destroy for ever; along with huge swathes of greenbelt. The open grassland, whilst it may not have an official Open Space designation, nevertheless provides a haven for a wide variety of birds, insects and mammals and a sense of 'openness' enjoyed by all. The supposed 'Wildlife corridor' or Wildlife Habitat Network has become increasingly fragmented around the villages and this fragmentation is set to increase if these proposals are adopted. The council must ask itself; in the headlong rush to provide land for development; at what point will this fragmentation lead to the wildlife environment becoming unviable. The network of narrow, quiet lanes in these villages will not support the additional number of trips generated by the proposed developments. This will lead to accelerated deterioration of the roads and increased journey times and environmental pollution and cannot therefore be considered sustainable as claimed by the council.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Sites LP0221, LP0782, LP1041 and LP1543 must be removed from the list of allocations in the Local Plan

Additional Evidence Link:

Comment ID **Lpp217**

Site ref (if applicable):

Person ID: **1182461** Name: **Mr Peter Flesher** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

I am really echoing comments made by others. However in support of these I have to say that the proposed developments, particularly the 2 large ones are totally unrealistic. They will spoil the entire environment and character of Shelf. More specifically the access to both sites is unsuitable. In one case the local roads are far too narrow for construction traffic and to cope with the extra traffic which will be created. In the other case, if the only access is onto Halifax Road opposite the factory this is totally unacceptable. it is far too narrow. In addition traffic on that road, particularly at peak times is already far too much. Queues in both directions can be the entire length of the village already. Any proposed access into South lane has the same problem as the site up Cock Hill with narrow roads unsuitable for construction traffic or any increased load. Access out of Shelf moor Road into Halifax road is already difficult. Where will the extra children go to school. Where will the new residents go to see a doctor. What will have to drainage. The extra housing up belle View already caused flooding in the dip near West Street. Such large developments are totally unsuitable for the area

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **Lpp700**

Site ref (if applicable):

Person ID: **1094062** Name: **Miss Helga Oates** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

The roads in both Shelf and Northowram already experience heavy congestion, with long delays being experienced throughout the day on the mainroads (A6036 and A644). The proposed sites are presently accessed via narrow lanes which will not support additional traffic, construction or future residential. More traffic will be generated by new residents need of essential day to day items as the village of Shelf has limited local shops, namely one butchers and one chemist (the bakery is a sandwich shop with limited opening hours mid week), and additionally an Esso garage at Stone Chair and a Lidl on the Bradford border. Sites LP0782 and LP1543 are a distance from all of these and as parking is an issue I would envisage the majority driving to a local town for milk, bread & a newspaper. Sites LP0782 and LP1543 are on the hill side above the existing housing, this area is colder and suffers from stronger winds that the lower lying areas of Calderdale. Property will burn more fuel in order for inhabitants to keep warm thus increased pollution at a time when we are meant to reduce green house gasses.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Remove Sites LP0782 and LP1543 from plan

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5062198>

Comment ID **Lpp906**

Site ref (if applicable):

Person ID: **1183644**

Name: **Mrs Naomi Teasdale**

Organisation: **Planner England Lyle Good**

Agent ID: **1182451**

Name: **Mrs Naomi Teasdale**

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Please see covering letter

Do you consider the plan to be Sound?: **No**

Sound Reason:

Please see covering letter (summarised below): Windmill Farm should be removed from the Green Belt and allocated as housing on the basis that it does not meet the tests set out at paragraph 134 of the recently-published NPPF which has indeed previously been accepted by the Council in allocating the site for housing as part of the Initial Draft Local Plan. Moreover, the housing numbers put forward as part of the Publication Draft are not considered to be robust enough for the Local Plan to be found 'sound'. The Publication Draft is however only proposing 840 dwellings per annum after members decided to go with the lowest option put forward despite being advised that this was low. The figure proposed is indeed at the lower end figure identified in the SHMA and on this basis, it is clear that there is a higher level of need which should be forthcoming as per the guidance contained in PPG. It is also noted that the provision of land for future employment use required 60ha in the Initial Draft Local Plan but has increased to 97ha in the Publication Draft despite the level of housing being reduced. One could argue that increased provision of employment land requires an increase in housing to be able to support its long-term sustainability. For the reasons already stated the site should be released from the Green Belt given that it has been previously assessed in relation to its suitability for residential development couples with the identified

need for a higher number of houses in Calderdale. The Council's current position to discount the site on the basis of needing to protect the Green Belt as far as possible and the Council's housing need is therefore considered unfounded and not based on robust evidence. Future Development Potential We have held pre-application discussions with the Council regarding residential development of this site which would be forthcoming in the short term and developed by national house builder, Berkeley DeVeer, whom have completed many successful developments in this region. The reasons why our client's site is considered suitable for residential development are as follows: The site is in a sustainable location directly adjacent to the settlement of Shelf. The site has good access to services and facilities, including being within 400m of a bus stop with a service at least every 30 minutes; Joins the urban area on two of its three sides; Site access is achievable from Burned Road; There are no known ecological or heritage constraints to developing the site; The site is entirely in Flood Zone 1; There are no protected trees or hedgerows on or around the site; Part brownfield land, the re-use of which is supported in planning terms. There are a number of sites within the revised plan which will have difficulties being brought forward. Additional sites which are available and deliverable should therefore be retained within the Publication Draft in order to be found sound.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Please see covering Letter

Suggested Modifications:

Windmill Farm should be removed from the Green Belt and allocated as housing.

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5075249><http://calderdale-consult.objective.co.uk/file/5074292>

Main Issues and Council Response

Legal Compliance

Main Issues:

Council's Response:

Test of Soundness

Main Issues:

1. Distribution of sites is uneven.
2. The Green Belt assessment is incorrect.
3. Exceptional circumstances for the release of Green Belt have not been demonstrated.
4. Hough/A58 junction as well as the local road network as a whole is not suitable for additional traffic inc HGVs
5. Impact on the character of the area.

6. Impact on wildlife habitat network.

7. Numerous site specific comments which can not be attributed to a site.

Council's Response:

1. The paper to the Local Plan Working Party 17th August 2016 attached to evidence document EV09 considers the distribution of development throughout the Local Plan process. The Council considers its distribution of development to be justified and supportive of sustainable development.

2. The Green Belt Review Parcels do not directly relate to the individual sites that have been proposed for allocation in the Publication Draft Local Plan. Using the same methodology as the Green Belt Review, proposed development sites in the Local Plan that are located in the Green Belt were assessed against the Green Belt purposes in the NPPF using the boundaries of the site itself.

3. Document EV 09 Exceptional Circumstances for the Release of Green Belt (2018) considers the process that the Council has followed in relation to the potential need to release land from the Green Belt. It can be seen that a methodical approach has been built into each stage of the process and that ultimately this process has dovetailed with the Government's emerging policy on exceptional circumstances.

4. Infrastructure considerations to include the impact of development on the local road network have been taken into consideration as part of the site assessment process.

5. The site is not situated within a Special Landscape Area. However, chapter 20 of the Local Plan contains a Landscape Character policy which ensures that new development is designed in a way that is sensitive to its landscape setting, retaining and enhancing the distinctive qualities of the landscape area in which it would be situated.

6. Impact on the Wildlife Habitat Network has been considered in the Site Assessment methodology and Policies in place to ensure the Wildlife Habitat Network is not fragmented.

7. A number of the points raised in the representations are against a site which is unidentifiable, therefore the Council can not respond to them.

Duty to Co-operate

Main Issues:

Council's Response:

Suggested Modifications

1. The Local Plan should retain an appropriate amount of development in Northowram and Shelf and reduce or remove one of the Garden Suburbs to ensure sustainable distribution of development.

Council's Response:

1. The paper to the Local Plan Working Party 17th August 2016 attached to evidence document EV09 considers the distribution of development throughout the Local Plan process. The Council considers its distribution of development to be justified and supportive of sustainable development.
No modification required.

Representations

Comment ID **APX1000**

Site ref (if applicable): **LP0221**

Person ID: **1183540**

Name: **Miss Chloe Rose**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment). The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt ["To preserve the setting and Character of Historic Towns]. If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given

that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation.

CONSERVATION/HERITAGE Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets.

ACCESSIBILITY The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as "less than 15mins" As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites.

SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX1005**

Site ref (if applicable): **LP0221**

Person ID: **1183690**

Name: **Mr Jared O'Farrell**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). 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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX1010**

Site ref (if applicable): **LP0221**

Person ID: **1183700**

Name: **Mrs Jared O'Farrell**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on

both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. CONSERVATION/HERITAGE Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets. ACCESSIBILITY The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as "less than 15mins" As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites. SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX1011**

Site ref (if applicable): **LP0221**

Person ID: **1183704**

Name: **Mr Jared O'Farrell**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote

and preserve through its various GI policies but does nothing to support with this proposed allocation. CONSERVATION/HERITAGE Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets. ACCESSIBILITY The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as "less than 15mins" As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites. SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX1015**

Site ref (if applicable): **LP0221**

Person ID: **1128013**

Name: **Mr Martin Blower**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

The plan is unsound as there are areas of conflict and contradiction between the information supplied in the council's supporting documentation and the reality of the impacts of the development on the community of Northowram as identified in the several public consultations carried out for the local plan. Greenbelt The Greenbelt Site Survey identifies the site as 'medium sensitivity', scoring only two out of the five purposes of Green Belt. However there are concerns that the assessment has resulted in an inaccurate

score. Q2 - "Is there a strong defensible boundary between the existing urban area and the site?" to which the assessment has answered NO. This is a greenbelt assessment more suited to a rural environment. In this case there are clear boundaries. To the North is a steep hill which identifies the start of the Quarry to the East and South it is the boundary of residential land and to the West is a steep slope into the Shibden valley so the answer to this question should be YES. Q3 - "Is there a wildlife designation or value?" to which the assessment has answered NO. This is inconsistent with the LP Policies Map which designates part of the site as a Wildlife Habitat Network therefore the answer should be YES. Q5 - "Is there an ecological or geological/ geomorphological designation or value?" to which the assessment has answered NO. This is inconsistent with the Ecology assessment and Natural England determination that there are 2 UK BAP Priority Habitats on the site which are deciduous woodland and lowland meadow therefore the answer for this question should be YES. Considering Purpose III, Q7 - "Is the land tranquil?" to which the assessment has answered NO. I regularly walk our dog within the boundaries of this site and the site is peaceful and quiet with very little sound intruding into an area of tranquillity. Due to nature of the site it easily complies with the Local Plan definition of: - "Tranquil Areas - Areas sufficiently remote from the visual or audible intrusion of development or traffic to be considered unspoilt by urban influences." So the answer should be YES Contrary to the assessment contained in the supporting information the site clearly fulfils the designation of greenbelt and therefore should not be included in the plan as the councils policies state "only using the most sensitive greenbelt sites when all alternative sites have been considered and the local plan will be required to demonstrate exceptional circumstances if land is to be removed from the greenbelt" and it is difficult to see what exceptional circumstances could arise to include site LP0221 until every brownfield and underutilised site has been developed. Flooding Taken from the site assessment report: replacing open and green area with the new development and resulting flooding pressure to downstream properties. From the past flooding history of an area, the site is being used as flood storage area during winter flooding. The site is located within 100% within Flood Zone 1. Numbers of drainage issues have been occurred in the surrounding areas and suitable actions being placed. Topography and water features that affect the layout of the development as site is used for flood storage. The sustainability application recommends that due to the site's greenfield status, and resulting potential to increase run-off, green and blue Infrastructure on site such as SUDS and green roofs to reduce the infiltration rate of precipitation as well as provide storage for storm water run-off." The site acts as a natural area of rainfall absorption holding heavy rainfall which would otherwise run off into the Shibden valley and then releasing it gradually over the following days preventing flooding and erosion. The existing vegetation transpires considerable quantities of rainfall back into the atmosphere and therefore reduces the level of the sites water table naturally. The loss of this vegetation will significantly increase the amount of water in the ground or in run off as the ground is more likely to be at field capacity. In the supporting information it states a flood risk assessment is required. If a flood risk assessment has not been completed how does the council know what level of drainage infrastructure will be required to replace an existing fully functioning flood storage area and whether the mitigation measures will fit on site without impacting on the undeveloped land areas. All this information should have been in place when the site was first assessed however the site has been allocated into the final plan without the appropriate assessments being carried out and before it is known what mitigation is required and whether it is feasible and affordable. Storm water runoff and other wet-weather induced flows from urban catchments are major sources of pollution into receiving watercourses resulting in water quality impairments and related adverse impacts on the ecology of streams and local receiving water bodies. These flow sources are also a primary cause of flooding and erosion. In this case any excess water flow from the development will end up in Shibden lake which is used for boating, is susceptible to algal bloom and is home to a wide range of water fowl. The proposed green Infrastructure relates to water management systems such as Bio-filtration, ponds, wetlands, rain gardens and other natural land and plant based ecological treatment systems and processes. However in an urban development the space requirements for "Green Infrastructure" are such that they are often not feasible solutions and for Springhead space is at a premium split between development land and retained openspace.. Due to the site slope from the Windmill Drive boundary

house construction will require significant cut and fill of the land to create level foundations and these excavations will cut through the existing free draining topsoil to the subsoil clay layer which occurs about a metre down. This will destroy any existing site drainage so any heavy rainfall will no longer be absorbed by the land and will run off. When this includes the surface run off from concrete drives, tarmac roads patios and roofs this will require substantial mitigating measures to cope with the intense rainfall which occurs several times per year and leads to flooding in other areas of the borough. Although the area of land required is unknown due to the lack of a detailed assessment it has to be placed between the development and the edge of the Shibden valley which is either in the 10-metre buffer zone or the woodland which would significantly damage the existing site ecology. There is also the risk that in heavy rain conditions an insufficiently sized green infrastructure would overflow into the grounds of the mansion house immediately below the development site. Green roofs can cost up to £15K per dwelling to install depending on the type/size of roof and planting which will add a cost of around £ 700K to the development. Add this to the cost of the mitigating drainage and the additional cost per house will make this a very expensive development and not the affordable housing which the council is committed to building.

Highways From the local plan supporting information: "Several comments questioning the ability of Windmill Drive to accommodate the potential number of dwellings. Current guidance indicates that a road of this type and geometry would be suitable subject to minor mitigating measures. There are also comments on the traffic impact and absence of traffic calculations. The Transport Assessment in any submission would address impacts on the immediate area and identify any road layout changes. Cumulative traffic impact is being assessed by the Council using the strategic model. Access appears to be possible from existing residential road Windmill Drive. Although this is a minor residential street and not designed to accommodate large numbers of additional trips. Development traffic would use Hough to access the A6036 Bradford Rd and A58 Leeds Road in Halifax or Town Gate to access the Westercroft Lane / Bradford Rd crossroads in Northowram. Subject to assessment may need mitigation at Westercroft Lane / Bradford Rd crossroads and Hipperholme crossroads." The supporting information refers to a need to commission a traffic assessment at submission and the cumulative traffic impact is being assessed by the council using the strategic model. Again it appears that the site has been allocated without detailed traffic calculations. Neither are there detailed proposals as to how the concerns of residents that the existing road infrastructure is woefully inadequate following the new build developments which have taken place over the last 20 years never mind the additional 100 + cars feeding into these roads both from this development and the 28 dwellings proposed off upper lane. Even the council's supporting information identifies that Windmill Drive is not designed to accommodate large numbers of additional trips and that is based on existing parking and takes no account of the exponentially increasing numbers of cars on Windmill Drive as non car owning houses and bungalows are sold to multiple car owning families with a consequent increase in on road parking. Adding a further potential 90+ car trips each way per day along a narrow residential road would make life intolerable for residents. The above mentioned new developments have also resulted in significantly increased the traffic flow down the Hough and along Towngate and Lydgate along roads which were never designed for heavy or high volume traffic and there is now the additional numbers of people who drive to and park outside the village shop and school. These roads are within the Northowram conservation area and therefore there are limited options to manage the existing traffic increase without there being any further traffic increase which would turn a drive through the village into a nightmare. The only traffic calming measures in the last 20 years have been two speed bumps by Baxter Lane and the recently introduced 20mph speed limit. Therefore, the volume of traffic travelling down the Hough to Stump Cross and out along Lydgate to the crossroads with the A58 will continue to increase naturally to potentially unmanageable quantities without the addition of proposed Springhead development. The supporting information for development traffic quotes: "Development traffic would use Hough to access the A6036 Bradford Rd and A58 Leeds Road in Halifax or Town Gate to access the Westercroft Lane / Bradford Rd crossroads in Northowram. Subject to assessment may need mitigation at Westercroft Lane / Bradford Rd crossroads and Hipperholme." That the council should put forward this option is hardly credible as the Highways department has put up signs at the junction at the

bottom of the Hough and on Lydgate stating that the whole of the stretch of road from the Hough through the centre of the village is unsuitable for heavy vehicles. Construction traffic driving regularly through the village centre will make the existing bottle neck along Towngate through the village almost impossible to drive through and the turn off onto Lydgate from the A58 is dangerous for heavy vehicles due to parked cars and existing traffic causing lorries to stop with part of the vehicle still blocking the A58. . The Hough is almost impassable to heavy vehicles at the Stump cross junction due to parked cars and the cobbled road part of the Hough which form a significant part of Northowram's heritage are not designed for heavy vehicles and the passage of significant numbers of construction vehicles over it will simply accelerate the amount of damage and decay to the cobbles.

Open Space From the local plan supporting information: "The site is currently designated as greenbelt but also performs the function of a natural/semi-natural open space. An assessment of open space in the area shows that there are sufficient alternative natural/semi-natural areas within the catchment of this site to meet the adopted standards. The requirements to offset the impact of any development on existing open space facilities will be assessed on submission of a planning application. The visual impact of any development should be considered and the public right of way through the site should be safeguarded." An assessment of nearby open space shows that the Springhead site is the only area which is reasonably even to walk on. There is an area of greenspace between Springhead and the quarry, but I understand that is quarry land and access is prevented for many people by deep ditches dug to keep people out. The Shibden valley although crossed by footpaths is a sloping area not suitable for all walkers and beyond that is farmland. There is public open space in the village however there is conflict between its different uses as a public play area, football pitch and dog walking area So to summarise Springhead is the best greenspace area and the suggested alternatives are not suitable for everyone and if the quarry reopens as has been suggested the some of the areas of open space will become out of bounds to walkers.

Site ecology From the local plan supporting information: "Reduce developable land by providing a buffer of 10m around the site and around the woodland within the site. Retain the vegetation within these buffers and supplementary plant with locally native shrubs. Perform protected species survey. Restore an area of lowland meadow to be used as open space by supplementary planting with appropriate species and management." The site has a significant number of mature beech, sycamore and oak trees spread across the site and forms part of the green corridor along the Shibden valley. The site has an incredibly rich diversity of wildlife some of which are resident on the site and some pass through along the corridor. The flora and fauna have developed over a long period of time and use the whole area as a food source or a home. The plant species have grown and adapted to the microclimate of the site. It is therefore naive to assume that the species will adapt to a narrow 10 metre corridor around the edge of an urban development rather than a wide-open space. Especially as the 10m buffer zone will become a narrow corridor hemmed in on both sides by garden boundary walls and fences which will create a different micro climate than the open space. The suggestion to plant locally native shrubs is misguided as the existing wildlife is supported by the matured landscape of th Springhead site and the proposed shrubs may not be compatible with the needs of the existing wildlife. For instance there are no broom or gorse plants growing on this site yet these naturally occur in the adjacent quarry land and support different species compared to the flora of Springhaed Also the wear and tear on the buffer zone will be increased as people use it as a linear dog walking path disturbing what little wildlife will be left. Some of the species that form part of the fauna are protected so the management of the site also assumes that these protected species will be able to cope with the upheaval and disruption to their natural habitat by over a year of construction noise, traffic and disturbance and it also assumes that the protected species habitat will fall neatly into the 10m bufferzone. Why bulldoze an existing habitat and then try to recreate it at considerable expense in the knowledge that the replacement is likely to fail and will not provide the free roaming wildlife habitat currently enjoyed by the wildlife at Springhead

Conclusion The council has spent a lot of time and effort successfully gathering the views of the residents of Calderdale through three consultation processes and in the local plan it states that the plan should reflect the needs and priorities of their communities, contribute to enhancing our natural, built and historic environment and as part of this helping to improve biodiversity, and that the final plan

demonstrates how comments made have influenced the final plan. Given the views of the residents in the 2011 consultation, the 181 comments on the online 2017 consultation and the 90+ comments on the current 2018 it is clear that the council is ignoring its own consultation process. The site remains allocated despite overwhelming evidence through the consultation process that residents consider that the Springhead development delivers none of the above and will actually have a significant impact on the lives of the community through loss of greenbelt, loss of community open space, intolerable increases in traffic levels and consequent air pollution and recommending immediate development of a greenbelt site before as outlined in the supporting information 'all brownfield or underutilised land should developed before considering the greenbelt at Springhead' as evidenced in the final line of the supporting documentation that ' the landowner has confirmed that the site is available immediately

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

In order to preserve the quality and character of the community of Northowram, this site should be removed from the Local Plan as there is little available evidence to demonstrate that the proposed management and mitigation measures for the site will be able to address the impacts the development of Springhead as housing will have on the village of Northowram and surrounding areas .

Additional Evidence Link:

Comment ID **APX1022**

Site ref (if applicable): **LP0221**

Person ID: **1183708**

Name: **Mrs Susan Grogan**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment). The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt ["To preserve the setting and Character of Historic Towns]. If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan.

Additional Evidence Link:

Comment ID **APX1024**

Site ref (if applicable): **LP0221**

Person ID: **1183552**

Name: **Mr Chris Turner**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment). The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt ["To preserve the setting and Character of Historic Towns]. If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of

deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation.

CONSERVATION/HERITAGE Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets.

ACCESSIBILITY The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as "less than 15mins" As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites.

SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan.

Additional Evidence Link:

Comment ID **APX1026**

Site ref (if applicable): **LP0221**

Person ID: **1183570**

Name: **Mr Bryan Hall**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment). The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt ["To preserve the setting and Character of Historic Towns]. If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. CONSERVATION/HERITAGE Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets. ACCESSIBILITY The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is

40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as "less than 15mins" As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites. SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX103**

Site ref (if applicable): **LP0221**

Person ID: **1126252**

Name: **Mrs Pauline Pye**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green

Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. The infrastructure of the whole area is threatened because of the narrow streets and accessibility. Vehicles have great difficulty now before further additional traffic caused by the new proposed developments. The local services. e.g schools and doctors are over subscribed meaning that new residents will have to travel out of the area increasing traffic demands. Similarly, the Journey time to GP is shown as "less than 15mins" As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX1031**

Site ref (if applicable): **LP0221**

Person ID: **1182489**

Name: **Mr John Faulkes**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

How are we (as laymen) expected to know the ins and outs of planning law? A few years ago I was offered a chance to buy the land behind 90 Windmill drive. When I contacted the planning department I was told in no uncertain terms that I should stay clear because as far as planning was concerned any expansion would be contrary to the authorities green belt policy. How has this changed?

Do you consider the plan to be Sound?: **No**

Sound Reason:

So more cars you must be joking!! How are we going to move? The whole plan should be scrapped. How many planning offers have visited the site?

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX1041**

Site ref (if applicable): **LP0221**

Person ID: **1183832** Name: **Mrs Julie King** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV " "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation (Heritage) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed

buildings. Conservation (Ecology) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX105**

Site ref (if applicable): **LP0221**

Person ID: **1122891**

Name: **Mr Anthony Pye**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). The infrastructure of the village has not been taken into account in sufficient detail therefore, the huge increase in traffic will cause increasing difficulties. The roads are very narrow not allowing vehicles to pass safely and increasing the dangers to pedestrians, especially children walking to school. The local services are presently oversubscribed meaning new residents will have to travel out of the area for schools and doctors adding to the difficult roadmanagement system at present. The environment will suffer as there is an abundant wildlife in the area. Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along

which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets. The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as "less than 15mins" As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites. The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX109**

Site ref (if applicable): **LP0221**

Person ID: **1094062**

Name: **Miss Helga Oates**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances

have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. Conservation/Ecology The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. Conservation/Heritage Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets. Accessibility The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as "less than 15mins" As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX114**

Site ref (if applicable): **LP0221**

Person ID: **1121795**

Name: **Mr Mark Powell**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. Conservation/Ecology The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the

site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. Conservation/Heritage Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets. Accessibility The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as "less than 15mins" As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX118**

Site ref (if applicable): **LP0221**

Person ID: **717396**

Name: **Mrs Hoare**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. Conservation/Ecology The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. Conservation/Heritage Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets. Accessibility The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey

time to GP is shown as "less than 15mins" As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX122**

Site ref (if applicable): **LP0221**

Person ID: **1117675**

Name: **Mr Peter Hoare**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow.

Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. Conservation/Ecology The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. Conservation/Heritage Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets. Accessibility The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as "less than 15mins" As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX129**

Site ref (if applicable): **LP0221**

Person ID: **1171108** Name: **Mr Brian Crossley (SNLPF)** Organisation: **Chairperson SNLPF**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt The Greenbelt Site Survey identifies the site as 'medium sensitivity', scoring only two out of the five purposes of Green Belt. The assessment has been carried out in a highly subjective manner resulting in an incorrect and low score. Considering Purpose III, Q2 - "Is there a strong defensible boundary between the existing urban area and the site?" to which the assessment has answered NO. It is not appropriate to look for natural boundaries such as rivers, roads etc. where Green Belt butts up to the urban area. The boundaries between the urban area to the east and partial urban areas to the north and south are formed by the extents of residential curtilages. A situation that was presumably acceptable in previous planning judgement so it is inappropriate and inconsistent to now define those boundaries as 'indefensible'. The remaining site boundaries do not abut the urban area so are irrelevant. The only correct answer therefore to this question must be YES. Considering Purpose III, Q3 - "Is there a wildlife designation or value?" to which the assessment has answered NO. This is inconsistent with the LP Policies Map which has designated part of the site as a Wildlife Habitat Network. The only correct answer therefore to this question must be YES. Considering Purpose III, Q5 - "Is there an ecological or geological/geomorphological designation or value?" to which the assessment has answered NO. This is inconsistent with the Ecology assessment and Natural England determination that there are in fact TWO UK BAP Priority Habitats on the site i.e. Deciduous Woodland and Lowland Meadow. The only correct answer therefore to this question must be YES. Considering Purpose III, Q7 - "Is the land tranquil?" to which the assessment has answered NO. A site visit will quickly show that the site is almost totally silent except for insects and birds. There is no intrusion from traffic noise and the area is an oasis of tranquillity in this remote corner of the village (see plates LP0221, 1 to 5 attached). We refer the Inspector to the definition of a tranquil area contained in Annex 4 of this Local Plan document: - "Tranquil Areas - Areas sufficiently remote from the visual or audible intrusion of development or traffic to be considered unspoilt by urban influences." The only correct answer therefore to question 7 must be YES. From the above it can be seen that the only possible conclusion is that the site DOES fulfil Green Belt Purpose III, contrary to the result arrived at by the assessment. Considering Purpose IV, Q2 - "Would the loss of this Green Belt land adversely affect the special character of a historic place or settlement?" and Purpose IV, Q3 - "Would the loss of this Green Belt land reduce the significance of a historic place or settlement?" to which the assessment answers NO to both. NPPF Para 129 states: - 129. Local planning authorities should identify and assess the particular significance of ANY heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and ANY aspect of the proposal. (our capitalisation) Further, the guidance contained in the Local Plan Greenbelt review states: - "Contribution to setting of historic place or settlement and cultural heritage. Consideration to be given to the relationship between land being reviewed and designated conservation areas, listed buildings, historic parks and gardens or other important heritage features." The assessment has only considered a possible impact on the nearby GdII Registered Historic Park and Garden at Shibden Hall. It has neglected to consider

any impact on the nearby Northowram Conservation Area from the inevitable development traffic, which Highways DM state would have to pass through it and which would be an inevitable consequence of the loss of this Green Belt site. We submit that a correct Green Belt assessment of this site would come to the only possible conclusion that it fulfils four of the five purposes of Greenbelt instead of the two out of five from the flawed assessment. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. The Local Plan Technical Paper: "Exceptional circumstances for the release of Green Belt" states that the Plan utilises the emerging National Policy in its approach to exceptional circumstances. Para. 136 of the emerging National Policy states: Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic plan-making authority should have examined fully ALL OTHER REASONABLE OPTIONS for meeting its identified need for development. This will be assessed through the examination of the plan, which will take into account the preceding paragraph, and whether the strategy: makes as much use as possible of suitable brownfield sites and UNDERUTILISED land; (our capitalisation) It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small, UNDERUTILISED sites in urban areas that have been omitted from the plan simply on the grounds of their area. A 'full examination of all reasonable options' should, by definition, have included them. Highways Development Management Highways DM have stated that development traffic would use either Hough or Towngate to access the A58 or A6036. We challenge the view by Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Resident's cars parked near the A58 junction make it especially narrow (see plates LP0221, 6 to 10 attached). Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. Towngate also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's" as shown in the attached photos and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of both development and residential traffic.

Conservation/Ecology The site assessment has identified that the site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site as can be seen from our attached photos (see plates LP0221, 3 to 5, 11 & 12 attached) so it is ridiculous to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation which only allows for a 'buffer zone' around the site boundary and ignores large areas of deciduous woodland within the site. It is also not clear what the purpose is of the 10m buffer zone around the edge of the site. What is it a buffer against? Is it intended that this buffer zone becomes the only remaining area of UK BAP Priority Habitat on the site, if so it is woefully inadequate. It cannot be a buffer between development and Priority Habitat because the habitat is being destroyed by development. If it is, sadly, to become the only remaining area of Priority Habitat on site then this should be strengthened by specifying an additional buffer zone (suggest 25m minimum) within the 10m zone, to reduce the possibility of contamination during development and to prevent the encroachment of gardens, colonisation of garden plants, dumping of garden waste and fly tipping on the BAP priority habitat. Such a buffer distance should apply to all development including roads and footways. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached of the impact of development on any species present. Although this requirement normally only relates to a Planning Application, failure to take account of this at this stage may mean that, when a Planning Application is submitted, even though the site is allocated for development in the Local Plan, the presence of species in a UK or Calderdale BAP may mean that the site cannot actually be developed or the anticipated quantum of development is undeliverable. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths as can be seen in the attached photos (see plates LP0221 "" 2 to 5, 11 & 12 attached). Additionally, there is a PROW (Calderdale

378) across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. Policy GN1 - Securing green infrastructure provision states (extract): "The Council will put mechanisms in place to secure Green Infrastructure provision in the Borough. To achieve this, the primary focus will be on: Improving and enhancing existing Green Infrastructure assets, and/or expanding existing, or creating new, Green Infrastructure assets; Encouraging the protection, enhancement and creation of Green Infrastructure through the Development Management System; New development must be served by Green Infrastructure to meet the needs of the prospective residents in a manner which will contribute to the creation of a high-quality environment and provide access to high quality open space for leisure and recreational purposes. Development proposals should ensure that: The Green Infrastructure function of the land is retained and where possible improved; The opportunity is taken to extend and increase Green Infrastructure by linking green spaces, filling in gaps in Green Infrastructure provision, and/or increasing Species and Habitats of Principal Importance." The proposal for development on LP0221 is not compliant with policy GN1. Policy GN2 - A joined up green infrastructure network states (extract): "The Council will ensure that the Green Infrastructure network is joined up. Existing spaces should be interlinked allowing biodiversity and humans safe access to, and transit between, a range of valued spaces. To achieve this, decisions upon development proposals shall have particular regard to: Maintaining critical biodiversity assets and providing long term security for these as identified in the Calderdale Biodiversity Action Plan; The proposal for development on LP0221 is not compliant with policy GN2. Policy GN3 " " Natural Environment states (extract): "Development proposals which are likely to have a significant adverse impact on a site with one or more of the following designations, habitats or species will not be permitted except in exceptional circumstances where the reasons for the proposed development clearly outweigh the value of the ecological feature adversely affected and there are no appropriate alternatives: ii Local Wildlife Sites (LWS); iii Calderdale Wildlife Habitat Network (or similar designation); iv Priority habitats and species within the Calderdale Biodiversity Action Plan;" No exceptional circumstances have been put forward and there are many appropriate alternatives therefore the proposal for development is not compliant with policy GN3. Policies GN1, GN2 and GN3 all state, as one of their targets: "Increase the Borough's woodland cover each year to 2031 (amount to be determined);" The proposal for development of LP0221 is contrary to the stated aims and targets of GN1, GN2 and GN3. Conservation/Heritage Conservation (Heritage) comments have failed to understand or address the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering from congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets. NPPF para 129 requires that, when considering how the significance or setting of a heritage asset may be affected, ALL aspects of a proposal must be considered, this must by definition include development traffic. The Conservation (Heritage) assessment is flawed because it has failed to consider if the Highways DM proposals are likely to result in harm to elements which contribute to the significance of a Conservation Area or the Listed Buildings within it. Accessibility We have challenged the accessibility scoring before and we do so again. The site assessment states that modelling from WYCA has been used but since the input data has not be specified for time of day or class of person it is impossible to give a fully developed comment. For example, the journey time to town centre is shown as less than 15mins. Using the WY Metro 'Journey Planner' and assuming elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest bus stop. Similarly, the Journey time to GP is shown as less than 15mins. As there is no suitable bus route to the nearest GP surgery this journey must be on foot, for the same class of person this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and rather than promoting the use of

Sustainable transport will force more people to use car journeys to and from these increasingly inaccessible sites. Sustainability The Sustainability Assessment scores only 4 'positive' outcomes out of 17 with 12 outcomes being 'uncertain'. However, the Accessibility RAG scoring has been used to justify the positive outcomes on two of the objectives; SA 3 " "To create and retain healthy vibrant and inclusive communities" and SA5 " "To improve accessibility to essential services, facilities and employment" Referring to our comments above on Accessibility, we believe that the RAG scoring is seriously flawed and thereby calls into question the 'positive' outcomes for SA3 and SA5. If only two (or at most four) of the 17 objectives are positive, we maintain that the site cannot be regarded as sustainable.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the list of allocations until ALL underutilised sites (including those below 0.25ha) have been FULLY considered for allocation.

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5052369>

Comment ID **APX137**

Site ref (if applicable): **LP0221**

Person ID: **1181727**

Name: **Mrs Judith A Halliday**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

I wish to object most strongly to the proposed development of houses at the top of Windmill Drive. This would add an enormous amount of traffic to the already congested main street in and out of Northowram (Lydgate/Towngate). This thoroughfare is already impassable at many times throughout the day, particularly at school starting and finishing times, to such an extent that vehicles often mount the pavement in order to pass each other. This is virtually a single track road due to cars etc constantly parked along most of the thoroughfare. This cannot become any worse or the road will be completely grid locked. I also believe neither the local school or surgery will be able to cope with the extra influx of residents.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX142**

Site ref (if applicable): **LP0221**

Person ID: **1128648**

Name: **Mr Richard Hamer**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

The Plan is Unsound because there are within it conflicts with and contradictions against its own policies. This representation relates to the site LP0221 Land at Spring Head, Northowram. There are two parts to this representation. Part 1. The development of the proposed housing site will have a detrimental visual impact of the environs of the Shibden Valley and as such is in conflict with other environmental policies of the proposed Local Plan. There is no evidence that a fully justified Topographical Study and Impact Assessment has been undertaken in respect of the effect that building homes on this site would have on the environs of Shibden Valley as a whole, which is designated a Special Landscape Area: or the effect on the Grade 2 Historic Park and the Listed Shibden Hall. This part of the representation indicates that there will be an adverse impact, and this is in contradiction of the environmental policies of the Local Plan. Shibden Valley is regarded by many as one of the most beautiful valleys in the north of England. The issues are that the character of the Shibden Valley and its special features, such as those mentioned above, and its general wider setting, is well defined along the sides of this valley and most particularly the skyline. Although development in the 60's on the southern edge of Northowram did have an impact on the skyline; after many years the glimpses of modern housing that formed an incongruous and detrimental distraction from the beauty of the valley has assimilated into the landscape as a consequence of dense tree cover, much of which lies on this proposed housing site. That housing is located over the edge of the valley skyline but was seen for many years. This proposed housing site is positioned on the actual upper slope of the valley. The Council's initial site appraisal referred to the site having a slope, but it made no reference to the fact that the slope towards the open valley is 35 feet [Google Earth topographical indicator], this being from the entrance to the developable site at its northern point down to the southern boundary of the developable site which lies at the edge of a very steep incline into the valley bottom at Stump Cross. The Council seeks to mitigate the effect of the housing development by relying upon the screen of a partial deciduous woodland. However, by their very definition, the trees within a deciduous woodland shed their leaves from Autumn to Spring and for a greater part of the year, the houses will be exposed to views from the park. This will create an incongruous feature that will be a major distraction from the beauty of this valley and this is considered unacceptable and a poor selection of a new housing site. The A58 is a major traffic route out of Halifax towards Leeds and Bradford and all points towards the north and east of Yorkshire including the Yorkshire Dales. Travelling up New Bank out of Halifax town Centre is a heavy urban experience. Rounding the top of New Bank and into Godley Cutting transforms this experience into one of rural beauty in an instant. It is this instant transformation that makes the taking of this route a unique experience. Travelling through the cutting and onto the Godley Embankment widens out to expose the full extent of the valley, and it is at this very point that the proposed housing site will have its greatest adverse impact. It will detract from its beauty and the attractive relationship between the wooded eastern hillside and the junction of Stump Cross. Part 2. Development of a further 46 Homes will have an adverse impact on the residential community of the village of Northowram and cause adverse traffic conditions within the village and surrounding areas and as such will be in conflict with other environmental policies of the proposed Local Plan. Northowram is a Conservation village that played an important role in the

development and growth of historical Halifax. Until the 1950's it remained very much in its original form, but during the 50's and the following decade, it was steadily expanded but it retained its original character and function as an isolated semi-rural village. Located between Halifax and the Bradford suburbs to the north. This suburban expansion and consolidation didn't change the village much and indeed it helped to establish a more viable village heart, and modern shops were built and the school expanded. Today the village is suffering badly after 40 years of substantial suburban expansion. The village centre functions as a car park with an informal one-way system of traffic movement along Town Gate. The pavements are compressed as they accommodate parked cars, and pedestrian safety has declined in the village. As a living environment, the village has deteriorated significantly. The Council has been pressured over the years to accommodate new suburban housing but this has been against sound Planning Principles. What has happened to Northowram is an example of poor quality Town Planning as the need to accommodate new homes has been at the expense of residential amenity and pedestrian safety. Town Planning has given way to 'Town Cramming'. Accordingly, the policy to add more homes at the location LP0221 will exacerbate already unacceptable problems and is in conflict with other environmental statements [inter-alia paragraph Transport 13.2] in the Proposed Local Plan. The proposed housing site will accommodate 46 new homes. According to typical family homes in Northowram and elsewhere, this holds a potential 80 to 100 new cars on the roads of Northowram. The village is already over-provided with cars and this has destroyed the character and quality of the village and the safety of walking members of the community. There can be no justification for adding any additional cars to manoeuvre around what is an overcrowded local road system. Cars emerging from the proposed housing site will meet The Hough and turn right or left. A right turn will take the cars down The Hough into a hazardous road junction with the A58 main distributor. But before emerging, these cars will need to merge with 'rat-running' traffic emerging from the upper country lanes of Shibden Valley. At peak periods this traffic junction is extremely dangerous at a non-signalled intersection. Cars turning to the left join an ad-hoc one-way system that has become the inevitable result of an over-loaded narrow road system through the heart of this historical village centre "Town Gate. These cars exacerbate already unacceptable and dangerous conditions for pedestrians and other drivers. These conditions contradict all other policies and proposals of the proposed Local Plan that seek to facilitate improved road safety. The policies and proposals aim to contribute to sustainable planning. Adding further housing developments to the southern extremity of this village will not serve the purpose of sustainable planning. It is a naive consideration that attaching new housing to a village will support its viability or reduce car journeys. Parents of the new homes may walk their children to school, although there is evidence that this is not the norm as many village residents use their cars to take children to the local school. It is uncommon to see pedestrians carrying shopping bags through the village streets. Mobility throughout the village is generally through the use of cars. This housing site will likely throw another 80-100 cars onto these village roads and this is unacceptable, whichever direction they are driven. Town Planning is intended to regulate the growth of towns and villages to apply sound planning principles, making life better for home owners, road users and the community as a whole. Propositions that do not achieve these or have the effect of making things worse for the community should not be allowed. There is a conflict within the service of a Local Planning Authority. On one hand it deals with the color of a developer's brick, but on the other hand it makes proposals that has a significant adverse impact on an entire community" ; creating hazardous road conditions and an environmental decline, that nobody wants This is not acceptable and this representation objects to the addition of any more homes in the southern segment of Northowram Village, on the basis that it is conflict with written policies that seek to create improvements to living and working conditions of the community of Calderdale and to preserve and enhance its natural beauty . In order to preserve the quality and character of the Shibden Valley and its environs, and the residential community of Northowram, this site should be eliminated from the Local Plan otherwise the proposed housing site will conflict with other environmental policies in the proposed Local Plan. Note: this objector attended Halifax Technical High School. In 1961 he was subsequently employed at the age of 16 as a Town Planning Pupil at the Halifax Borough Council, before moving on as a Chartered Town Planner in Senior Planning Officer roles, and latterly as Planning consultant. He lived in Northowram

for 40 years, between 1965 and 2005. Living in the USA, he regularly visits Halifax and stays with relatives in Windmill Drive. He represents himself and all residents of Northowram.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Because of the adverse impact that the building of houses on this site will have on the Shibden Valley, additional views of the Shibden Valley, the Historic Park and the setting of a Listed Building, and the impact that additional generated traffic will have on the community of Northowram village, this site should be removed from the proposals map as a housing site

Additional Evidence Link:

Comment ID **APX147**

Site ref (if applicable): **LP0221**

Person ID: **1124482**

Name: **Mr Ben Stables**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of

development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. CONSERVATION/HERITAGE Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets. ACCESSIBILITY The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as "less than 15mins" As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites. SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX156**

Site ref (if applicable): **LP0221**

Person ID: **1181790**

Name: **Mrs Linda Briggs**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. CONSERVATION/HERITAGE Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development

traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets. ACCESSIBILITY The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as "less than 15mins" As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites. SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX160**

Site ref (if applicable): **LP0221**

Person ID: **1121443**

Name: **Mrs Christine Moussavi**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV " "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the

grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "" "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site "" 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." "Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation (Heritage) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. Conservation (Ecology) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" "Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" "stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has

a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX164**

Site ref (if applicable): **LP0221**

Person ID: **1116568**

Name: **Mrs Pauline Stead**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable

development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. CONSERVATION/HERITAGE Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets. ACCESSIBILITY The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as "less than 15mins" As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites. SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan.

Additional Evidence Link:

Comment ID **APX168**

Site ref (if applicable): **LP0221**

Person ID: **1129101**

Name: **Mrs Susan Barrington**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX170**

Site ref (if applicable): **Lp0221**

Person ID: **1181780**

Name: **Mrs Valerie Moore**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

i oppose the site for all these houses on the grounds of the strain it will have on our facilities in our villages. The doctors surgery is already on only 5 half days a week. The schools and hospitals are already stretched. One of my main concerns is the amount of pollution we will be faced with by the cars that are already at a standstill at peak hours on the main road. Site number LP 1543 along with LP 0782 adjacent will produce 495 houses which may have two cars per household. We are trying to clean up the pollution not add to it, this is also green belt land.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX175**

Site ref (if applicable): **LP0221**

Person ID: **1124475**

Name: **Mr Peter Horne**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that

Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable.

CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation.

CONSERVATION/HERITAGE Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets.

ACCESSIBILITY The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as "less than 15mins" As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites.

SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX176**

Site ref (if applicable): **LP0221**

Person ID: **1130909** Name: **Mr Muhammad Azhar Ullah** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. Conservation/Ecology The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX181**

Site ref (if applicable): **LP0221**

Person ID: **1131102**

Name: **Mr Phil Taylor**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). 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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX186**

Site ref (if applicable): **LP0221**

Person ID: **1131193**

Name: **Mrs Susan Taylor**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX195**

Site ref (if applicable): **LP0221**

Person ID: **1126186** Name: **Mr Andrew Spence** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. Conservation/Ecology The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram,

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX210**

Site ref (if applicable): **LP0221**

Person ID: **1181877**

Name: **Mr John Esmond**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

The volume of traffic in Northowram is already high, on Towngate in particular but also on Lydgate where vehicles entering and leaving the village from or onto Bradford Road encounter significant problems. These are worse in the morning and afternoons during school term time. It is this amount of traffic which leads parents to accompany their children to school in cars rather than allow them to take their lives in their hands in walking to school. Speaking of which I am not too happy myself at the age of

83 in crossing Towngate. We have an excellent doctors' surgery in the village but pressure on it will increase, due to the projected growth in people aged over 75 whose medical needs place a disproportionate work load on the staff. It would be unwise to import more residents to the village when there are no plans to expand the surgery.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX233**

Site ref (if applicable): **LP0221**

Person ID: **1122297**

Name: **Mrs Patricia Raw**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholmegate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these

policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE. CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX248**

Site ref (if applicable): **LP0221**

Person ID: **1181925**

Name: **Mrs Joanne Turner**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt

assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment). The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt ["To preserve the setting and Character of Historic Towns]. If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. CONSERVATION/HERITAGE Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets. ACCESSIBILITY The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as "less than 15mins" As there is no suitable bus route to the nearest GP surgery this

journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites. SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX257**

Site ref (if applicable): **LP0221**

Person ID: **1123214**

Name: **Mrs Nicola Sheehan**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict

traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. CONSERVATION/HERITAGE Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets. ACCESSIBILITY The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as "less than 15mins" As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites. SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Additional Evidence Link:

Comment ID **APX261**

Site ref (if applicable): **LP0221**

Person ID: **1122593** Name: **Ms Janet Griffiths** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. Conservation/Ecology The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram,

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX262**

Site ref (if applicable): **LP0221**

Person ID: **1122593**

Name: **Ms Janet Griffiths**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does

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but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX264**

Site ref (if applicable): **LP0221**

Person ID: **1181900**

Name: **Mr James Kirkbride**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on

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CONSERVATION/HERITAGE Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets.

ACCESSIBILITY The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as "less than 15mins" As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites.

SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX268**

Site ref (if applicable): **LP0221**

Person ID: **1122060**

Name: **Mr Carl Pope**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. Conservation/Ecology The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. Conservation/Heritage Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX272**

Site ref (if applicable): **LP0221**

Person ID: **1175701**

Name: **Mr Ian Smith**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX276**

Site ref (if applicable): **LP0221**

Person ID: **1175701**

Name: **Mr Ian Smith**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. Conservation/Ecology The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX277**

Site ref (if applicable): **LP0221**

Person ID: **1181959**

Name: **ms maggie robinson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Not sound on the grounds of unjustified use of Green Belt, insufficient consideration of additional traffic the new build will contribute to already congested and narrow roads. This will inevitably decrease road safety. Regarding Green Belt, there has been identified pockets of brown field sites, which could be utilised for additional housing instead of reducing Green Belt which is in danger of vanishing if such plans are to be sanctioned and in particular and more pertinently with regards to maintaining the conservation land within Northowram and the surrounding area. Northowram has narrow lanes which are already used for parking by many of the residents and which severely reduces the width of the lanes and roads and at peak times makes for congestion and inevitable road safety issues. In particular the Hough and junction on to A58 being already hazardous junction and very congested at peak times as well as off peak. An increase in car users coming out of Northowram and using these exit roads would impact tremendously on congestion and safety issues. In addition just getting up and down the Hough is difficult with the current level of traffic, as there are many blind spots due to the natural winding nature of this road and resident parking. An additional 100 plus cars would I believe cause traffic mayhem.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

By utilising small brown field sites and reducing large housing projects to smaller number of houses on the brown field sites, this would avoid the impact and utilisation of Green Belt sites and avoid the obvious knock on affect that increased numbers of cars and people would have in restricted access areas and by doing so this would be less detrimental to road safety.

Additional Evidence Link:

Comment ID **APX286**

Site ref (if applicable): **LP0221**

Person ID: **1126621**

Name: **Mrs M Wright**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

There is far too much traffic in the village already. Towngate is terrible to negotiate at most times. The impact would be terrible. Windmill Drive traffic would also increase by probably 90 cars - not good. The proposed site is a haven for wildlife. Oak trees grow in abundance too.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

this site should be removed from the local plan.

Additional Evidence Link:

Comment ID **APX305**

Site ref (if applicable): **LP0221**

Person ID: **1182040**

Name: **Mr. Derek armstead**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Not sound on the grounds of unjustified use of Green Belt, insufficient consideration of additional traffic the new build will contribute to already congested and narrow roads. This will inevitably decrease road safety. Regarding Green Belt, there has been identified pockets of brown field sites, which could be utilised for additional housing instead of reducing Green Belt which is in danger of vanishing if such plans are to be sanctioned and in particular and more pertinently with regards to maintaining the conservation land within Northowram and the surrounding area. Northowram has narrow lanes which are already used for parking by many of the residents and which severely reduces the width of the lanes and roads and at peak times makes for congestion and inevitable road safety issues. In particular the Hough and junction on to A58 being already hazardous junction and very congested at peak times as well as off peak. An increase in car users coming out of Northowram and using these exit roads would impact tremendously on congestion and safety issues. In addition just getting up and down the Hough is difficult with the current level of traffic, as there are many blind spots due to the natural winding nature of this road and resident parking. An additional 100 plus cars would I believe cause traffic mayhem.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX306**

Site ref (if applicable): **LP0221**

Person ID: **1094048**

Name: **Mr Paul Fallows**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. Conservation/Ecology The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. Conservation/Heritage Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX314**

Site ref (if applicable): **LP0221**

Person ID: **1124632**

Name: **Ms Leila Oates**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX315**

Site ref (if applicable): **LP0221**

Person ID: **1182124**

Name: **Mrs Amanda Tailford**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. Conservation/Ecology The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX316**

Site ref (if applicable): **LP0221**

Person ID: **1182126**

Name: **Mr John Tailford**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). 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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX323**

Site ref (if applicable): **LP0221**

Person ID: **1181972**

Name: **Miss Emma Greenwood**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX327**

Site ref (if applicable): **LP0221**

Person ID: **1120474**

Name: **Mr Neil Roddis**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX331**

Site ref (if applicable): **LP0221**

Person ID: **1182183**

Name: **Mr Martin Roberts**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

This greenbelt area is a haven for wildlife and walkers alike and is a major reason I wanted to live in Windmill Crescent as I am fortunate enough to overlook it. It is an area I envision my children exploring when they grow up and I would sincerely miss the view and walks if it were crammed full of houses. Making a rough assumption of 1-2 children and 1-2 cars per household, it is crazy to think that the village's

school and doctor's surgery, not to mention the already busy roads can cope with this proposed influx of houses. Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . 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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX332**

Site ref (if applicable): **LP0221**

Person ID: **1182180**

Name: **Mr thomas pettengell**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

I strongly object to the above plan on precious green belt land as access to the site is completely unsuitable for the increase in traffic that it would cause. The road to the area runs through a quiet residential area on a small minor road. Over the last few years there have been numerous water pipe bursts which will only get worse with the heavy lorries and extra traffic. More traffic going through the village is unacceptable as it can already be very difficult at times. The local school and Doctors are already struggling to cope, this development would stretch services even further. The area is a public right of way with trees and an abundance of wildlife which would all be lost forever.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX333**

Site ref (if applicable): **LP0221**

Person ID: **1182184** Name: **Mrs Kimberley Roberts** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

It would be a big shame to lose an open, green area next to my home that is a great place for walks and wildlife. The roads, school and doctors are already very busy with school opening/ closing times being particularly bad which would only worsen. Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan.

Additional Evidence Link:

Comment ID **APX336**

Site ref (if applicable): **LP0221**

Person ID: **1182186**

Name: **mrs Diane pettengell**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

I am strongly opposed to the development plan on green belt land in woodland off Windmill Drive. The access to the proposed development is totally unsuitable for the extra traffic that will inevitably come from

the contractors and the 46 proposed properties. This is a quiet residential area. We are encouraged to get out and take exercise, walk our children to school etc. yet our precious land is being taken for more houses. The extra traffic and pollution this development will bring cannot be environmentally friendly. The school and Doctors are already struggling, can they support at least another 92 people? This is green belt land that gives pleasure to people, it is full of various trees and wildlife, to build on this would simply be wrong.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX343**

Site ref (if applicable): **LP0221**

Person ID: **1182204**

Name: **Mr Nicholas Allan**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX345**

Site ref (if applicable): **LP0221**

Person ID: **1094132**

Name: **Mr Benjamin Lockwood**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment). The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt ["To preserve the setting and Character of Historic Towns]. If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. CONSERVATION/HERITAGE Conservation (Heritage) comments have failed to consider the full impact of the

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX350**

Site ref (if applicable): **LP0221**

Person ID: **1182228**

Name: **Mrs Lisa Lockwood**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX354**

Site ref (if applicable): **LP0221**

Person ID: **1121674**

Name: **Mr Stephen Owrid**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound: GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other

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SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX356**

Site ref (if applicable): **LP0221**

Person ID: **1123397**

Name: **Mrs Jenny White**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. CONSERVATION/HERITAGE Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX363**

Site ref (if applicable): **LP0221**

Person ID: **1130879**

Name: **Ms Gillian Hoesli**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Too much pressure on infrastructure. There are far more suitable areas which could accommodate development within Halifax namely Southowram, Elland Mixenden. Why are these areas, in addition to Coley, Hipperholme and Norwood Green not under consideration? Stop persecuting Northowram with this constant threat of over development. The area is constantly choked with traffic already...leave the village alone!

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

No idea

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX375**

Site ref (if applicable): **LP0221**

Person ID: **1182329**

Name: **Mrs Carol Browning**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment). The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt ["To preserve the setting and Character of Historic Towns]. If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given

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SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX376**

Site ref (if applicable): **LP0221**

Person ID: **1121671**

Name: **Mr Patrick Turner**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment). The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt ["To preserve the setting and Character of Historic Towns]. If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). 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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX412**

Site ref (if applicable): **LP0221**

Person ID: **1177730** Name: **Mr Eric Andrew Whitehead** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

In addition to the destruction of Tranquil green belt land which is being eroded throughout Northowram the number of residential properties being proposed at Spring Head will increase dramatically the number of vehicles being driven through the Windmill Estate along Windmill Drive onto Hough. The vast amount of this traffic will right turn down towards Stump Cross as Hough where it joins Towngate is already congested because of road width and parked vehicles, made more difficult because of restricted views in both directions between Upper Lane and Coley View. The traffic turning down Hough from Windmill Drive will increase already frustrating traffic difficulties at the Junction with Kell Lane and A58 at Stump Cross. The traffic wanting to go A 6036 towards Bradford may well also avoid the Towngate difficulties by going down Hough and left turning into Park View Avenue, a private road, to access the A 6036 just at the point where there is a restricted view towards Halifax. Potentially extremely dangerous situation.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

The only solution to avoiding increased traffic difficulties at Stump Cross / Kell Lane and the potential use

of Park View Avenue as an illegal "rat run" onto a private road with the consequent dangerous joining of the A 6036 is to have a "No Right Turn" legislation for traffic entering Hough from Windmill Drive. If compliant then this traffic will create difficulties between Upper Lane and Coley View Alternatively carry out a " U " turn at the Upper Lane/Heywood Close junction to comply with any No right turn restriction. Both negatively effecting road safety for othe road users both on road and foot.

Additional Evidence Link:

Comment ID **APX43**

Site ref (if applicable): **LP0221**

Person ID: **1093066**

Name: **Mrs Susan Crossley**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The

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SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX447**

Site ref (if applicable): **LP0221**

Person ID: **1024937**

Name: **Mr Ian Sanderson**

Organisation: **Principal Archaeologist
West Yorks Archaeology
Advisory Service**

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Need to add Heritage Impact Assessment on potential affect on significance on Registered Park & Garden, to Reports Required section, to comply with NPPF

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

See above

Additional Evidence Link:

Comment ID **APX47**

Site ref (if applicable): **Lp0221**

Person ID: **715153**

Name: **Mr Brian Crossley**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep,

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

To make the plan sound this site should be removed from the list of proposed allocations.

Additional Evidence Link:

Comment ID **APX471**

Site ref (if applicable): **LP0221**

Person ID: **1130391** Name: **Miss Alison Grogan** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment). The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt ["To preserve the setting and Character of Historic Towns]. If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant.

HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable.

CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is

tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation.

CONSERVATION/HERITAGE Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets.

ACCESSIBILITY The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as "less than 15mins" As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites.

SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan.

Additional Evidence Link:

Comment ID **APX472**

Site ref (if applicable): **LP0221**

Person ID: **1130670**

Name: **Mrs Lilian Grogan**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment). The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation

therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt ["To preserve the setting and Character of Historic Towns]. If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant.

HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable.

CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation.

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ACCESSIBILITY The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as "less than 15mins" As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan.

Additional Evidence Link:

Comment ID **APX482**

Site ref (if applicable): **LP0221**

Person ID: **1182455**

Name: **Mr Tony Grogan**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment). The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt ["To preserve the setting and Character of Historic Towns]. If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan.

Additional Evidence Link:

Comment ID **APX484**

Site ref (if applicable): **LP0221**

Person ID: **1128740**

Name: **Ms Susan Wilkinson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

See Attachment

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5063702>

Comment ID **APX488**

Site ref (if applicable): **LP0221**

Person ID: **1094032**

Name: **Mrs Sue Chadwick**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep,

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX491**

Site ref (if applicable): **LP0221**

Person ID: **1182477** Name: **Miss Jasmine Mitchell** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment). The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt ["To preserve the setting and Character of Historic Towns]. If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. **HIGHWAYS DEVELOPMENT MANAGEMENT** Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. **CONSERVATION/ECOLOGY** The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan.

Additional Evidence Link:

Comment ID **APX494**

Site ref (if applicable): **LP0221**

Person ID: **1123300**

Name: **Miss Melissa Hall**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect

because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. 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Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX496**

Site ref (if applicable): **LP0221**

Person ID: **1129581**

Name: **Mr Stephen Patchett**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on

Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation.

CONSERVATION/HERITAGE Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets.

ACCESSIBILITY The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as "less than 15mins" As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites.

SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan.

Additional Evidence Link:

Comment ID **APX503**

Site ref (if applicable): **LP0221**

Person ID: **1182454**

Name: **Miss Jessica Walker**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment). The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt ["To preserve the setting and Character of Historic Towns]. If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. CONSERVATION/HERITAGE Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan.

Additional Evidence Link:

Comment ID **APX504**

Site ref (if applicable): **LP0221**

Person ID: **1182499**

Name: **Mr William Grogan**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment). The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt ["To preserve the setting and Character of Historic Towns]. If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan.

Additional Evidence Link:

Comment ID **APX509**

Site ref (if applicable): **LP0221**

Person ID: **1122023**

Name: **Miss Rachel Cubitt**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. Conservation/Ecology The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX52**

Site ref (if applicable): **LP0221**

Person ID: **1129112**

Name: **Mr Kevin Firth**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. Conservation/Ecology The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. Conservation/Heritage Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX529**

Site ref (if applicable): **LP0221**

Person ID: **1128520**

Name: **Mrs Kathryn Patchett**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX536**

Site ref (if applicable): **LP0221**

Person ID: **1182598**

Name: **Mr Matthew Hoyle**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment). The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt ["To preserve the setting and Character of Historic Towns]. If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. CONSERVATION/HERITAGE Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan.

Additional Evidence Link:

Comment ID **APX537**

Site ref (if applicable): **LP0221**

Person ID: **1182599**

Name: **Miss Sarah Firth**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment). The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt ["To preserve the setting and Character of Historic Towns]. If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan.

Additional Evidence Link:

Comment ID **APX541**

Site ref (if applicable): **LP0221**

Person ID: **1182575**

Name: **Mr Darren Hodgson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. Conservation/Ecology The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX551**

Site ref (if applicable): **LP0221**

Person ID: **1182651**

Name: **Mrs Sandra Whitehead**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

I believe the infrastructure of Northowram is already over stressed and cannot support any extra traffic. As the cars from this site will have to drive through the Windmill Estate on roads that were built to support cars from this estate only and not extra traffic from another large estate, then either turn left to go through Towngate and Lydgate to get to Bradford road which is already a much congested area with cars parked from cottages with no room to park their cars but on the roadside thus making it very difficult to negotiate, not forgetting at certain times of the day extra traffic passing the school which can be extremely dangerous for the children and parents plus the extra children from any new development in the area, or the other option which most will use is to turn right from the Windmill Estate to go down the Hough which in my opinion is even more difficult to negotiate as they continue passed Hill View Gardens the road begins to narrow and the cars from the house on the Hough cannot all park outside their own houses as there is not enough space therefore they park lower down on the bend outside Springhead Manor and this bend does not even have double yellows making it so dangerous as cars coming up having to pass the parked cars do not have the view to see cars coming down therefore quite often meet each other on the bend. This is where we have seen many near accidents and is getting worse by the day. Then as they continue down the Hough it get narrower more bends with parked cars all the way down to the junction at Stump Cross which is also getting more congested by the day, again with many near accidents. This is a narrow cobblestone road with lots of bends but at least the cobbles do tend to slow most drivers down thank goodness. All in all either way is not suitable for extra traffic.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX562**

Site ref (if applicable): **LP0221**

Person ID: **1182716**

Name: **Mr David Hobbs**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment). The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt ["To preserve the setting and Character of Historic Towns]. If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments

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the facilities will not enjoy what we have had if this building continues!!!!!!.....

Do you consider the plan to be Sound?: **No**

Sound Reason:

Not compatible with roads and access and the school already at bursting point.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Do not agree with the planning of extra housing in our small village.

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX57**

Site ref (if applicable): **LP0221**

Person ID: **1094032**

Name: **Mrs Sue Chadwick**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and

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ACCESSIBILITY The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as "less than 15mins" As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites.

SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX572**

Site ref (if applicable): **LP0221**

Person ID: **1121289** Name: **Mr Tony Hubbert** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

There is no detail to explain the consideration in demand on traffic and schools

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX584**

Site ref (if applicable): **LP0221**

Person ID: **1182788** Name: **Mrs Margaret Pearce** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways DM have stated that Development traffic would use either The Hough or Towngate to access the

A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. The Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. The Hough and Towngate are signed as being "unsuitable for HGV's" and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. There is a Public Right of Way across the northern end of the site. The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX594**

Site ref (if applicable): **LP0221**

Person ID: **1182831**

Name: **Mrs Abigail Goodwin**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the

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Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. 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It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. CONSERVATION/HERITAGE Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. 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can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX595**

Site ref (if applicable): **LP0221**

Person ID: **1182832**

Name: **Mr Nikki Goodwin**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other

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CONSERVATION/HERITAGE Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets.

ACCESSIBILITY The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as "less than 15mins" As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites.

SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX603**

Site ref (if applicable): **LP0221**

Person ID: **1182852**

Name: **Mrs Laura Montgomery**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant.

Conservation/Ecology The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation.

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above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX61**

Site ref (if applicable): **LP0221**

Person ID: **1123394**

Name: **Mrs Barbara Bartle**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP

Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation.

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SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX611**

Site ref (if applicable): **lp0221**

Person ID: **1124325**

Name: **Mrs Susan Hainsworth**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. Conservation/Ecology The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. Conservation/Heritage Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

The site should be removed from the local plan.

Additional Evidence Link:

Comment ID **APX64**

Site ref (if applicable): **LP0221**

Person ID: **1116616**

Name: **Mrs Susan Thompson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX72**

Site ref (if applicable): **LP0221**

Person ID: **1179313**

Name: **Miss Natalie Kelly**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland

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SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX731**

Site ref (if applicable): **Lp0221**

Person ID: **1129819**

Name: **Miss Sonia Maud**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. Conservation/Ecology The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. Conservation/Heritage Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets. Accessibility The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" Using

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan.

Additional Evidence Link:

Comment ID **APX733**

Site ref (if applicable): **LP0221**

Person ID: **1183242**

Name: **Miss Francesca Harikiopoulou**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment). The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt ["To preserve the setting and Character of Historic Towns]. If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan.

Additional Evidence Link:

Comment ID **APX735**

Site ref (if applicable): **LP0221**

Person ID: **1138662**

Name: **Mrs Margaret West**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

See Attachment

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5072699>

Comment ID **APX76**

Site ref (if applicable): **LP0221**

Person ID: **1121374**

Name: **Mrs Nicola Parker**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the

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has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX764**

Site ref (if applicable): **LP0221**

Person ID: **1176584**

Name: **Mr Leslie Dawson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

The area's close to this proposed development are old narrow streets which this development would need access to there is already a major access problem in this area with parking on either side of the road, the additional traffic that would result from this development in this area would create grid lock. There are no plans for improvement to local services to facilitate this proposal. The plan does not give adequate justification for building on Greenbelt land.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX773**

Site ref (if applicable): **LP0221**

Person ID: **1183380**

Name: **Mr Andrew Izzard**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. CONSERVATION/HERITAGE Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets. ACCESSIBILITY The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" Using

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX798**

Site ref (if applicable): **LP0221**

Person ID: **1183449**

Name: **Mr John Maud**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan.

Additional Evidence Link:

Comment ID **APX82**

Site ref (if applicable): **LP0221**

Person ID: **975323**

Name: **Mr Charles Shaw**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX826**

Site ref (if applicable): **LP0221**

Person ID: **1121978**

Name: **Mrs Bridget Simpson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). 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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX830**

Site ref (if applicable): **LP0221**

Person ID: **1128166**

Name: **Miss Alice Simpson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow.

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX839**

Site ref (if applicable): **LP0221**

Person ID: **1130687**

Name: **Miss Kate Oworm**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

below is my response gathered under headings. given that the wildlife living here will be terrified and then killed, an area of natural beauty irrevocably destroyed, though technically legally sound any development on this site would be nothing short of criminal. the infrastructure surrounding the site is not equipped for an influx of housing. this will lead to congestion, pollution and an increase in mental health issues and loss of working hours due to stress of traffic. the local health care facilities (and schools) and oversubscribed and cannot cater for the proposed inhabitants. GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. Conservation/Ecology The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

The site should be removed from the Local Plan. There are no modifications that can make this sound.

Additional Evidence Link:

Comment ID **APX865**

Site ref (if applicable): **LP0221**

Person ID: **1130060**

Name: **Mr James Priestley**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

The plan is unsound as there are areas of conflict and contradiction between the information supplied in the council's supporting documentation and the reality of the impacts of the development on the community of Northowram as identified in the several public consultations carried out for the local plan.

Consultation Phases (underlining is mine) The introduction to the aims of the local plan states: "These sites are required to accommodate an ever-expanding population, to create new places and spaces, reflecting the needs and priorities of their communities and to ensure that the mutually dependent economic, social and environmental pillars of sustainability are met Environmental: 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"

Previous consultation - 2011 These are the comments made by residents of Northowram and Shelf at the Calderdale Council LDF Workshop and contained in Report 4, Northowram, Hipperholme and Shelf April 2011:

Roads and traffic "Congestion is a big concern of local residents "" specifically around Stump Cross and Hipperholme crossroads. They think the speed and volume of traffic poses a serious hazard for pedestrians and drivers, particularly in Northowram. Heavy loads and rat-run traffic through residential areas are also concerns. In addition, residents think that the roads in their area are not sufficiently well maintained. The impacts on their quality of life are feelings of frustration, anger and the real threat of danger to life."

New build developments "Residents are concerned about the volume of unsympathetic new builds and infill development in the area which threatens the village feel, the separateness of each village and the surrounding open spaces. Residents feel their views about planning are not being taken seriously by the council and are extremely concerned about the 'degradation of the community feel with too many people coming in too fast'. The impact on their quality of life is an increasing sense of feeling 'hemmed in', loss of pride in the specialness and character of the area, stress when planning applications go against their wishes, and the constant fear that they will lose everything they value about the area. "We like to feel that two minutes from our door we are effectively in the countryside. It's this feeling of being hemmed in, filling all the empty spaces with homes "" and it's almost Calderdale Council policy to 'build as many as we can' with not enough jobs for people." Any little open patch, they'll whack a house on it. It's disregarding the need for open spaces." It's got a lot more developed housing-wise. I see development as a positive word, but in this way development is bad because it's sort of ebbing away at the community spirit, ebbing away at the green space, ebbing away at the service provision because it's over-running the doctors and the schools "" I think that's wrong."

Wishes for the future "Decreased congestion, safer roads and an improved public transport system. Safer roads for pedestrians, residents and commuters are also a priority "" addressed primarily through traffic reduction."

Open space "Plenty green spaces No loss of green spaces The green belt is as it was in 2011 if not even bigger Lots of good quality open spaces Greenspace, trees and wildlife are protected and nurtured " Development "Less development (housing) in Northowram Less infill development "" small is beautiful New buildings on brown sites not in countryside"

The residents wanted the council to "Stop housing development in Northowram Stop large-scale building development Stop new, big estates which will mean loads more cars Stop any building on green spaces Stop building large new developments with little/no parking with overspill onto other roads Stop poor quality development Stop building so many homes without an increase in service provision "

The explanatory note about the consultation statement in the local plan states 'this sets out the Consultations that the Council has undertaken in preparing the Local Plan, and demonstrates how comments made have influenced the final plan .' Given the above comments made by residents as part of the initial earlier consultation process regarding the loss of greenbelt, traffic congestion, the level of building and infill and the impacts on the community of further development in Northowram the continued inclusion of the Springhead development among others in the Northowram and Shelf area make it difficult to see exactly how the consultation has influenced their decision as the Springhead development will exacerbate most of those concerns voiced by residents in 2011 and clearly does not reflect the needs and priorities of the communities.

Previous consultation 2017 In 2017, 181 people including ward councillors commented online (there may have been paper forms submitted but these cannot be seen online) how they considered that the Springhead development was

unsuitable given the constraints of traffic, unsuitability of the road infrastructure, impact on the Northowram conservation area, and pressure on existing services such as the doctors and village school. (This is the second largest number of comments on any site in the local plan). Again, these consultation comments although noted do not seem to have influenced the plan and despite considerable concerns being voiced about the unsuitability of the site and how its development will have significant impacts on the village and road networks the site remained in the plan. According to the Site Reports volume 3 all these concerns raised can be mitigated however in several cases the appropriate assessments which would inform the mitigation have not yet been commissioned. It raises the question how can the site be recommended for inclusion if not all the facts are known or whether the mitigation is appropriate or affordable? Also, although the council refers to mitigation exactly what form this will take has not been identified either in the supporting information or in the other local plan supporting documents. Without knowing what is proposed makes the consultation process more difficult as we are commenting on unknowns.

Consultation 2018 The 2018 consultation has seen a reduced number of comments. This should not be seen as a lack of interest in the process but more of a result of a lack of clarity in the local plan explaining that this was a new consultation process and previous comments will not be brought forward into this consultation. There are also concerns that there is the following statement in the plan: "Note: Any submission of petitions or multiple duplicated letters will be counted as one representation)"

While it is understandable that a single person submitting multiple copies of a duplicated standard letter would not be considered as effective consultation it is hoped that this discrimination will not be applied to where different people who wish to make comments on the development but feel that they may not have adequate knowledge or understanding of the technical details should be penalised by downloading suitable information from help sites such as that provided by the Northowram and Shelf Local Plan Forum .

Greenbelt The Greenbelt Site Survey identifies the site as 'medium sensitivity', scoring only two out of the five purposes of Green Belt. However there are concerns that the assessment has been overly subjective resulting in an inaccurate score and low score. Q2 - "Is there a strong defensible boundary between the existing urban area and the site?" to which the assessment has answered NO. This is a greenbelt assessment more suited to a rural environment. In this case there are clear boundaries. To the North is a steep hill which identifies the start of the Quarry to the East and South it is the boundary of residential land and to the West is a steep slope into the Shibden valley so the answer to this question should be YES. Q3 - "Is there a wildlife designation or value?" to which the assessment has answered NO. This is inconsistent with the LP Policies Map which designates part of the site as a Wildlife Habitat Network therefore the answer should be YES. Q5 - "Is there an ecological or geological/ geomorphological designation or value?" to which the assessment has answered NO. This is inconsistent with the Ecology assessment and Natural England determination that there are 2 UK BAP Priority Habitats on the site which are deciduous woodland and lowland meadow therefore the answer for this question should be YES. Considering Purpose III, Q7 - "Is the land tranquil?" to which the assessment has answered NO. I regularly walk within the boundaries of this site and the site is peaceful and quiet with the occasional blue light service siren on the A58 being the only sound which intrudes into an area of tranquillity. Due to nature of the site it easily complies with the Local Plan definition of: - "Tranquil Areas - Areas sufficiently remote from the visual or audible intrusion of development or traffic to be considered unspoilt by urban influences." So the answer should be YES Contrary to the assessment contained in the supporting information the site clearly fulfils the designation of greenbelt and therefore should not be included in the plan as the Council should adhere to its own policies of "only using the most sensitive greenbelt sites when all alternative sites have been considered and 'the local plan will be required to demonstrate exceptional circumstances if land is to be removed from the greenbelt'" and it is difficult to see what exceptional circumstances could arise to include site LP0221 until every brownfield and underutilised site has been developed.

Flooding Taken from the site assessment report: "This site is not agreed in the public domain while Loss of green space, replacing open and green area with the new development and resulting flooding pressure to downstream properties. From the past flooding history of an area, the site is being used as flood storage area during winter flooding. The site is located within 100% within Flood Zone 1. Numbers of

drainage issues have been occurred in the surrounding areas and suitable actions being placed. However, the site is suitable for the development after necessary action for the surface water/drainage assessment." Mitigation Taken from the site assessment report: "Well planned site investigations. Topography and water features that affect the layout of the development as site is used for flood storage. The sustainability application recommends that due to the site's greenfield status, and resulting potential to increase run-off, green and blue Infrastructure on site such as SUDS and green roofs to reduce the infiltration rate of precipitation as well as provide storage for storm water run-off." In the supporting information it states a flood risk assessment is required. If a flood risk assessment has not been carried out, how do we know what level of mitigation drainage infrastructure will be required to overcome the destruction of the existing flood storage that the site currently provides and that the proposed mitigation measures will fit on site and work without impacting on the undeveloped land. Again, the site has been allocated into the final plan without the appropriate assessments being carried out and before it is known what mitigation is required and whether is feasible and affordable. Clearly the flood risk assessment should have been completed prior to the site's inclusion in the local plan and the necessary mitigation measures calculated and included in the supporting information. There is an increasing recognition that storm water runoff and other wet-weather induced flows from urban catchments are major sources of pollution into receiving watercourses resulting in water quality impairments and related adverse impacts on the ecology of streams and local receiving water bodies. These flow sources are also a primary cause of flooding and erosion. Green Infrastructure: These are water management systems such as Bio-filtration, ponds, wetlands, rain gardens and other natural land and plant based ecological treatment systems and processes. The real challenge however in a highly urbanised area is that space is usually at a premium. So though "Green Infrastructure" is attractive and the direction to go in terms of more sustainable approaches; in an urban development the space requirements for "Green Infrastructure" are such that they are often not feasible solutions. The site acts as a natural area of rainfall absorption holding heavy rainfall which would otherwise run off into the Shibden valley and then releasing it gradually over the following days preventing flooding and erosion. The site slopes from the northern boundary to the southern boundary with the contour line indicating a 15 metre (45ft) height difference from top to bottom. It is therefore almost certain that to build houses on the site will require significant cut and fill of the land to create level foundations and these excavations will cut through the existing free draining topsoil to the clay layer which occurs about a metre down. This damage to the existing soil strata will prevent free drainage of rainfall through the non-porous material exposed by the regrading and along with the run off in heavy rain from concrete drives, tarmac roads patios and roofs will lead to an increase in the amount of potential surface run off from the site into the Shibden valley. It is proposed to mitigate this with SUDs and green infrastructure however to be effective these would have to be placed between the development and the Shibden valley. Although the area of land required for these mitigating proposals is unknown the only area where this green infrastructure could be created is either by reducing the size of the development or placing it in the 10-metre buffer zone and woodland which would significantly damage the ecology. There is also the risk that in heavy rain conditions the suds and/or green infrastructure would overflow into the grounds of the mansion house immediately below the development site. Green roofs can cost up to £15K per dwelling to install depending on the type/size of roof and planting which will add a cost of around £ 700K to the development something which may try to be deleted in the future if developers are unwilling to risk the extra cost. The main selling point of green roofs is that they replace the vegetation lost by building the house however a replacement grassland 30ft in the air is of little use to wildlife which used to walk on the grass at ground level. Highways From the local plan supporting information: "Several comments questioning the ability of Windmill Drive to accommodate the potential number of dwellings. Current guidance indicates that a road of this type and geometry would be suitable subject to minor mitigating measures. There are also comments on the traffic impact and absence of traffic calculations. The Transport Assessment in any submission would address impacts on the immediate area and identify any road layout changes. Cumulative traffic impact is being assessed by the Council using the strategic model. Access appears to be possible from existing residential road Windmill Drive. Although this is a minor

residential street and not designed to accommodate large numbers of additional trips. Development traffic would use Hough to access the A6036 Bradford Rd and A58 Leeds Road in Halifax or Town Gate to access the Westercroft Lane / Bradford Rd crossroads in Northowram. Subject to assessment may need mitigation at Westercroft Lane / Bradford Rd crossroads and Hipperholme crossroads." The response to comments refers to a traffic assessment at submission and a culminative traffic impact being assessed by the council using the strategic model. Again, it appears that the site has been allocated without detailed traffic surveys and impact assessments being produced to address the concerns of residents and consultation respondents. Even the councils supporting information identifies that Windmill Drive is not designed to accommodate large numbers of additional trips. The age and occupancy numbers of the houses and bungalows on Windmill Drive and Crescent is slowly changing. A significant number of houses and particularly the bungalows on the crescent and drive were occupied by elderly single people or couples many of whom do not own or use a car. Over the last 10 years due to the desirability of living in Northowram there has been a change in the occupancy of the dwellings with more bungalows being bought by families with children resulting in 2+ cars per residence. This change from non-car owning to multiple car owning will see an increase in the number of car journeys along the Drive and Crescent even before any development of site LP0221 with a parallel increase in the amount of on street parking along both roads. In the last 20 years there have been significant increases in the number of houses in Northowram both on the site of the old Northowram hospital and the Heywood school and also the building of the houses in Haven close increasing the size of the village by 20%. This has significantly increased the traffic flow down the Hough and along Towngate and Lydgate and the number of cars parking outside the shops in the village. Despite this influx of cars, the only and the only traffic management mitigation in the last 20 years has been installing two sleeping policemen by the school and a 20mph speed limit through the village and both these are traffic calming measures rather than traffic management. Further recent applications for building include 6 dwellings off Howes lane and another 22 houses on Upper lane. If approved both these developments will deliver increased traffic into the Upper lane/ Towngate junction and the single-track Tetley Lane having a further impact on the already intense existing traffic pressures through the village. This is before considering the impact of a further 46 houses feeding traffic into the same area. Therefore, the volume of traffic travelling down the Hough to stump cross and out along Lydgate to the crossroads with the A58 will continue to increase naturally to potentially unmanageable quantities without the proposed Springhead development. From the 2011 consultation there are already concerns about the existing levels of parking and volume of traffic in the village of Northowram and in the 10 years I have lived there the amount of on street parking has increased to the point where it is now possible to drive from the Upper lane junction to the Baxter lane junction with little or no passing places creating a single lane through the village centre and there are occasions when the traffic is brought to a standstill by cars being unable to pass each other particularly when the local bus service is trying to drive through. To consider that creating a further traffic increase of up to 80+ additional cars passing through this bottle neck on a daily basis can be easily mitigated would indicate that it was considered by someone who does not have to drive through the village on a daily basis. The supporting information for development traffic quotes: " Development traffic would use Hough to access the A6036 Bradford Rd and A58 Leeds Road in Halifax or Town Gate to access the Westercroft Lane / Bradford Rd crossroads in Northowram. Subject to assessment may need mitigation at Westercroft Lane / Bradford Rd crossroads and Hipperholme." That the council should put forward this option is hardly credible as the Highways department has put up signs at the junction at the bottom of the Hough and on Lydgate stating that the whole of the stretch of road from the Hough through the centre of the village is unsuitable for heavy vehicles. Indeed the route is so difficult that a Wickes driver delivering building materials asked if there was another way out from Windmill Drive as the journey in had been so difficult due to parked cars and oncoming traffic. The Hough is almost impassable to heavy vehicles at the Stump cross junction due to parked cars and the cobbled road part of the Hough which form a significant part of Northowram's heritage are not designed for heavy vehicles and the passage of significant numbers of construction vehicles over it will simply accelerate the amount of damage and decay to the cobbles. Cars leaving the

development site along Windmill Drive and turning left into the conservation area of the village will exacerbate already unacceptable and dangerous conditions for pedestrians and other drivers. However due it being a conservation area options for improving traffic flow are very limited if not impossible. Also, the number of car journeys from the development to the local school will increase an already significant parking problem. Open Space From the local plan supporting information: "The site is currently designated as greenbelt but also performs the function of a natural/semi-natural open space. An assessment of open space in the area shows that there are sufficient alternative natural/semi-natural areas within the catchment of this site to meet the adopted standards. The requirements to offset the impact of any development on existing open space facilities will be assessed on submission of a planning application. The visual impact of any development should be considered and the public right of way through the site should be safeguarded." An assessment of nearby open space shows that the Springhead site is the only area which is reasonably even to walk on. There is an area of greenspace between Springhead and the quarry, but I understand that is quarry land and access is prevented for many people by deep ditches dug to keep people out. The Shibden valley although crossed by footpaths is a sloping area not suitable for all walkers and beyond that is farmland. There is public open space in the village however there is conflict between its different uses as a public play area, football pitch and dog walking area So to summarise Springhead is the best greenspace area and the suggested alternatives are not suitable for everyone and if the quarry reopens as has been suggested the some of the areas of open space will become out of bounds to walkers. Site ecology From the local plan supporting information: "Reduce developable land by providing a buffer of 10m around the site and around the woodland within the site. Retain the vegetation within these buffers and supplementary plant with locally native shrubs. Perform protected species survey. Restore an area of lowland meadow to be used as open space by supplementary planting with appropriate species and management." The site has a significant number of mature beech, sycamore and oak trees spread across the site and forms part of the green corridor along the Shibden valley. The site has an incredibly rich diversity of wildlife some of which are resident on the site and some pass through along the corridor. The flora and fauna have developed over a long period of time and use the whole area as a food source or a home. The plant species have grown and adapted to the microclimate of the site. It is therefore naive to assume that the species will adapt to a narrow 10 metre corridor around the edge of an urban development rather than a wide-open space. Especially as the 10m buffer zone will become a narrow corridor hemmed in on both sides by garden boundary walls and fences which will create a different micro climate than the open space. Also the wear and tear on the buffer zone will be increased as people use it as a linear dog walking path disturbing what little wildlife will be left. Some of the species that form part of the fauna are protected so the management of the site also assumes that these protected species will be able to cope with the upheaval and disruption to their natural habitat by over a year of construction noise, traffic and disturbance and it also assumes that the protected species habitat will fall neatly into the 10m bufferzone. Conclusion Clearly from all the consultation feedback and the council's own information the plan should reflect the needs and priorities of the communities (identified through the 2011 and 2017 consultation) and contributing to protecting and enhancing our natural, built and historic environment and as part of this helping to improve biodiversity. By continuing to include this site as part of the local plan the council is despite overwhelming evidence that this will have a significant impact on the lives of the community through loss of greenbelt, loss of community open space, increases in traffic levels and consequent air pollution and going against their own recommendations are determined to build on a valuable area of greenspace. It questions the value of consultation. This is highlighted by the fact that although as a greenbelt site all other brownfield or underutilised land should developed before considering Springhead the final line in the site assessment report is 'the landowner has confirmed that the site is available immediately' so clearly the council has no intention of waiting for the use of brownfield sites before developing Springhead. In order to preserve the quality and character of the community of Northowram, this site should be removed from the Local Plan as there is little evidence to demonstrate that the proposed management and mitigation measures for the site can address the impacts on Northowram and surrounding areas created by the site development.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Include what is proposed for the mitigations stated within the plan.

Additional Evidence Link:

Comment ID **APX867**

Site ref (if applicable): **LP0221**

Person ID: **1130687**

Name: **Miss Kate Owram**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

below is my response gathered under headings. given that the wildlife living here will be terrified and then killed, an area of natural beauty irrevocably destroyed, though technically legally sound any development on this site would be nothing short of criminal. the infrastructure surrounding the site is not equipped for an influx of housing. this will lead to congestion, pollution and an increase in mental health issues and loss of working hours due to stress of traffic. the local health care facilities (and schools) and oversubscribed and cannot cater for the proposed inhabitants. GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have

only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable.

Conservation/Ecology The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation.

Conservation/Heritage Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets.

Accessibility The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as "less than 15mins" As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites.

Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

The site should be removed from the Local Plan. There are no modifications that can make this sound.

Additional Evidence Link:

Comment ID **APX868**

Site ref (if applicable): **LP0221**

Person ID: **1183506**

Name: **Mr Thomas Galvin**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Building this many unaffordable houses in northowram, a small village community will destroy the local area and put further strains on the local traffic and amenities. You are further impacting the natural environment and utterly destroying everything that makes the area so special. The houses being built are not affordable, certainly not as started homes and this is more of a money making project for few, whilst ruining the lives of many others.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

The plan is unsound

Suggested Modifications:

It should be removed from the local plan

Additional Evidence Link:

Comment ID **APX869**

Site ref (if applicable): **Lp0221**

Person ID: **1183514**

Name: **Mr Abby Goodwin**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances

have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. CONSERVATION/HERITAGE Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets. ACCESSIBILITY The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as "less than 15mins" As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites. SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX889**

Site ref (if applicable): **LP0221**

Person ID: **1123556**

Name: **Mrs Beth Sky Horsfall**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. Conservation/Ecology The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the

site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. Conservation/Heritage Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets. Accessibility The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as "less than 15mins" As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX890**

Site ref (if applicable): **Ip0221**

Person ID: **1183530**

Name: **Mr Ben Manogue**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX893**

Site ref (if applicable): **LP0221**

Person ID: **1130687**

Name: **Miss Kate Owram**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Though it appears to be legally sound building in this beautiful haven for wildlife is actually nothing short of criminal. The suitability of the site is based on falsified information. The council claims to wish to preserve natural habitats. Destroying this greenbelt land will cause irreparable damage. GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment). The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt ["To preserve the setting and Character of Historic Towns]. If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development

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CONSERVATION/HERITAGE Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets.

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SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site must be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX898**

Site ref (if applicable): **LP0221**

Person ID: **1183534**

Name: **Mrs Marion Fisher**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment). The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt ["To preserve the setting and Character of Historic Towns]. If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant.

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Remove this site from the Local Plan.

Additional Evidence Link:

Comment ID **APX904**

Site ref (if applicable): **LP0221**

Person ID: **1128999**

Name: **Ms Lesley Priestley**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

The plan is unsound as the impacts of the proposed development will adversely affect the village through increase traffic, pressure on services and loss of valuable open green space. In the last 20 years the village of Northowram has seen a vast amount of new built houses with the development of the Northowram Hospital site, Hall Lane, Upper Lane, Heywood School and Haven Close (over 300 houses) This has had a major impact on traffic through the village to the extent that Towngate and Lydate are rapidly becoming a car park due to the level of on street parking and narrowness of the road and at peak times this road can become grid locked. Walking along the pavement in the village can be dangerous as cars often drive on the pavement to pass other cars. The addition of potentially 80+ cars from this development will only make the traffic far worse and inevitably it will cause accidents. At the moment I am not aware of any traffic surveys which have identified the impacts of the new development on the village roads. Those cars that are trying to avoid the village traffic will go down the Hough, which is already a rat run for traffic trying to

avoid the stump cross traffic lights. Traffic avoiding these two bottlenecks will use the Shibden valley route which will impact on upper lane and this route is not suitable for a large number of vehicles some of which will end up at stump cross anyway. Furthermore, in the accessibility document it is stated that journey time to Halifax will take 15 minutes, this is not an accurate representation of reality as journeys can take up to 40 minutes or more due to high levels of traffic especially at peak times. The Doctors surgery and school are both at capacity and there is no room to extend the school if more children come into the village. It is likely that surrounding Doctors and Schools will also be at capacity. The site is designated as Green Belt under wildlife habitat and also provides a tranquil site for people to walk and children to play. The impact on the wildlife of a development of this size will be devastating because the whole space is used by a wide variety of species of birds, mammals and insects. For example, there are bats, badgers, foxes, deer and a wide number of birds that use the trees for nesting such as sparrows, chaffinch, robins, blue tits and jays. Additionally, the site is a rich source of food for birds of prey such as Sparrow Hawks, Peregrine Falcons and Buzzards. The idea that all this wide range of wildlife can be pushed into a narrow 10 metre buffer zone around the new development is laughable as it will result in the loss of habitats and consequent loss of species some of which are protected. At the Shelf Local Plan consultation meeting one of the Council's Town Planners said that it wasn't a problem to develop this site as the wildlife would just move on. This is highly unlikely as this will mean wildlife from this site moving into existing territory of other wildlife. Presently this site is well used by dog walkers and the loss of this site will result in an increase of dog walkers using the small recreation ground which is already heavily used by dog walkers and the increase in dog walking will conflict with the site intended use as a recreation play area for adults and children. The proposed site currently acts an effective, natural method of managing any potential flood risk from precipitation as the soil absorbs water at a manageable rate through slow infiltration. The proposed plan would remove this natural, permeable surface and replace the area with non-permeable infrastructure (housing, roads and pavements) that would strongly affect the vital infiltration process. The development would also strongly impact the evapotranspiration rate as the space currently contains a vast amount of flora from shrubbery to a mature woodland site; without this natural infrastructure the area loses an important method of managing flood water. This would indefinitely impact the drainage of the land, leading to an increased pressure of infiltration along and down the steep slope behind the site as the rainwater would runoff the impermeable surface down into the Shibden valley; this would overall increase the flood risk for the valley below. The summary comments on the potential for using Sustainable Urban Drainage Systems (SUDS) with specific comments based around using Green Roofs, which is rather unlikely to be implemented in a sub-urban site such as this. Any method of reducing the infiltration rate would not mitigate the loss of the current natural infrastructure, that is if effective SUDS are even implemented which is questionable at best. Developments such as the one proposed are effectively a barrier for precipitation infiltration with small, limited drainages systems. This site would best be left undeveloped especially due to its location along the top of the Shibden valley. In conclusion despite over 180 comments on line in the 2017 consultation and as green belt it should not be developed until all other options have been developed in Halifax. The site should not have been approved for development. This is highlighted by the fact that although as a greenbelt site all other brownfield and underutilised land should be developed before considering Springhead the final line in the site assessment report is "the landowner has confirmed that the site is available immediately" so clearly the Council has no intention of waiting for the use of brownfield sites before developing Springhead.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

The Springhead site should be removed from the local plan.

Additional Evidence Link:

Comment ID **APX905**

Site ref (if applicable): **LP0221**

Person ID: **1183533**

Name: **Mr Nigel Owram**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is

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ACCESSIBILITY The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as "less than 15mins" As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites.

SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX906**

Site ref (if applicable): **LP0221**

Person ID: **1183552**

Name: **Mr Chris Turner**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment). The land is tranquil and the Site

Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt ["To preserve the setting and Character of Historic Towns]. If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. 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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan.

Additional Evidence Link:

Comment ID **APX91**

Site ref (if applicable): **LP0221**

Person ID: **1181078**

Name: **Mr G Simon Howard**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX910**

Site ref (if applicable): **LP0221**

Person ID: **1102440**

Name: **Mrs Ann Harris**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. CONSERVATION/HERITAGE Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development

traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets. ACCESSIBILITY The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as "less than 15mins" As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites. The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX912**

Site ref (if applicable): **LP0221**

Person ID: **1129276**

Name: **Mr Roger Briggs**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under

Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. 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Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites. SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX915**

Site ref (if applicable): **LP0221**

Person ID: **1093163**

Name: **Mr Richard Degnan**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets

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ACCESSIBILITY The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as "less than 15mins" As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites.

SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX925**

Site ref (if applicable): **LP0221**

Person ID: **1183570**

Name: **Mr Bryan Hall**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment). The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt ["To preserve the setting and Character of Historic Towns]. If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. CONSERVATION/HERITAGE Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan.

Additional Evidence Link:

Comment ID **APX930**

Site ref (if applicable): **LP0221**

Person ID: **1183582**

Name: **MS Nancy Budler**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX933**

Site ref (if applicable): **LP0221**

Person ID: **1183582**

Name: **MS Nancy Budler**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX936**

Site ref (if applicable): **LP0221**

Person ID: **1121652**

Name: **Mrs J Feltham**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of

greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. 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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Additional Evidence Link:

Comment ID **APX937**

Site ref (if applicable): **LP0221**

Person ID: **1128586**

Name: **Mr Martin Wood**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. The should be self evident to anyone who bothered to look at it. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX938**

Site ref (if applicable): **LP0221**

Person ID: **1129745** Name: **Miss Emma Priestley** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Northowram development plan The proposed plans for the northowram delevopment is unsounded and has not been thought through for the people who live in the village of northowram or the sorounding areas. Without these plans going ahead, northowram has become over ridden with cars and houses. For the past 20 years Northowram has near doubled in houses and the village is to its capacity. The road which leads through Lydgate is dangerous at most times of the day but added more housing around this site will increase the amount of cars which will use this road and will be more dangerous and they will be accidents. The roads which lead in to halifax are already busy at peak times and having more housing the traffic will again multiply The school is already at full to the capicity and been a former pupil there, the school already has extended the size and it is still full, so by adding more housing which will bring more children in to that school, would be unfair for childrens education. The drs Surgary is also full, having more and more people will put more strain on a practice which as it stands is very streched. The fields where the proposed housing site will be located on has some wildlife that should be aloud its area to live and grow. Foxes, badgers, bats i could go on but by what the council suggest by putting a barrier in for the enviroment is ridicuolous. The wildlife will yet again loose in a fight where it should be left alone. Also in the report, stating that hgvs will have a route going up the hough is incorrect. There is a legal road sign at the bottom of that road stating that heavy goods cannot go up that road due to weight and how steep the road is. This is putting the road and the people who live there at risk. Other roads throughout northowram are the same, cannot take hgvs, the old tight country back roads cannot take these vechiles and this is damaging the area. By putting housing on that land, the noise pollution will be risen throughout the vally also light pollution too.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

The springhead site should be removed from the local plan

Additional Evidence Link:

Comment ID **APX946**

Site ref (if applicable): **LP0221**

Person ID: **1183587** Name: **Mr Mathew Williams** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

This plan for more housing to be put on the site in northowram will put a risk on wildlife and the area of Northowram itself. The traffic down the A58 Which runs through northowram down to halifax is already busy throughout the day. The time to halifax takes should take 15 mins while at peak times it can take up to 40 mins. Then people use the back roads such as the hough to avoid this delay but then puts strain on the roads. Having more housing will increase the traffic and the roads will be very busy and become dangerous. At the moment parking is an issue throughout Northowram. The area wasn't design for the amount of traffic it has today. By increasing the area again with more housing the roads will increasinly be used as car parking. Towngate and Lydgate are the main routes through Northowram, at the moment these road are used for street parking and when people have parked up it is dangerous to drive down and also as a pedestrian dangerous because the pavement has been used for parking or the cars drive on the pavement to get round the on street parked cars. The doctors surgery is already full, it is difficult to get to see certain drs or even get an appointment because the amount of people using the practise. By building more housing the surgery will be over run. Over run in paitents and it will be even harder to get an appointment. The school is also at capacity, the school already has extended and previous years lost part of its land to housing, the childrens education and well being at that school will be effected. Adding more housing will bring children into the area and the school will suffer, so will the children. The fields which this plan has been decided to be on, is a place for children to play and residents to exersice there animals. By taking this away this will effect other areas such as the park or the football pitches because there wont be a land to use for this. Also this land has wildlife on it such as foxes, badgers and deer. By building these houses this wildlife will be gone. These animals have a right to have a place where they can live and not be pushed out. Also the comment which the council has propposed of an area for the wildlife next to where these houses are supposed to go is rediculous. These animals will not live there because it so close to people. The noise and light polution will increase as well over the shibden valley. this will impact in the surrounding areas not just Northowram. Also Northowram in the past 20 years has had ALOT of housing built on it, there are MANY MANY areas in Halifax where people can build and help with the housing crisis. There is alot of brown field sites in Halifax which is not getting used. Why should this village and this green belt area be effected where other ares in halifax on these brown field sites are not been used at all ?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

The spinghead site should be removed from the local plan

Additional Evidence Link:

Comment ID **APX99**

Site ref (if applicable): **LP0221**

Person ID: **1066927**

Name: **Mrs Sally Bulgacs**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. Conservation/Ecology The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. Conservation/Heritage Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX990**

Site ref (if applicable): **LP0221**

Person ID: **1183543**

Name: **Mr Chris Grogan**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment). The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt ["To preserve the setting and Character of Historic Towns]. If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan.

Additional Evidence Link:

Comment ID **APX992**

Site ref (if applicable): **LP0221**

Person ID: **1183641**

Name: **Mrs Caroline Whelan**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. Conservation/Ecology The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation,

which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. Conservation/Heritage Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets. Accessibility The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as "less than 15mins" As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX995**

Site ref (if applicable): **LP0221**

Person ID: **1183643**

Name: **Miss Sophie Kinghorn**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment). The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt ["To preserve the setting and Character of Historic Towns]. If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. 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40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as "less than 15mins" As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites. SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan.

Additional Evidence Link:

Comment ID **APX998**

Site ref (if applicable): **LP0221**

Person ID: **1183539**

Name: **Miss Ella Ashworth**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment). The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt ["To preserve the setting and Character of Historic Towns]. If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep,

narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. CONSERVATION/HERITAGE Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets. ACCESSIBILITY The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" - Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as "less than 15mins" - As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites. SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **Lpp1081**

Site ref (if applicable): **LP0221**

Person ID: **1182473**

Name: **Mr Peter Stowe**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

As there is no definition of this jargon, I didn't want to answer "no" and risk invalidation the whole process of objecting.

Do you consider the plan to be Sound?: **No**

Sound Reason:

As there is no definition of this jargon, I didn't want to answer "no" and risk invalidation the whole process of objecting. The proposed development is in a village already close to saturation with traffic (Towngate is effectively one-way due to parked cars). The school and doctors must be close to or at full capacity and heavy construction traffic travelling through an estate is close to madness. Adding another 60/70 cars t the already busy estate and local roads is ill thought out. The site is a tranquil area overlooking the beautiful Shibden Valley and the plan constitutes municipal vandalism

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

As there is no definition of this jargon, I didn't want to answer "no" and risk invalidation the whole process of objecting. (deliberately meant to confuse?)

Additional Evidence Link:

Comment ID **Lpp1156**

Site ref (if applicable): **LP0221**

Person ID: **960869**

Name: **Stonebridge Homes**

Organisation:

Agent ID: **691692**

Name: **Ms Lucie Jowett**

Organisation: **Senior Planner Barton Willmore**

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

See attachment

Do you consider the plan to be Sound?: **No**

Sound Reason:

LP0221 - Land at, Spring Head, Northowram, Halifax, HX4 4.40 Whilst LP0221 earns the same overall score against the SA objectives as our Client's Site, LP0221 serves two of the Green Belt purposes in comparison to the one purpose our Client's Site performs. Our Client's Site is therefore more sequentially preferable for removal from the Green Belt and the allocation of LP0221 ahead of our Client's Site is unsound. See attachment

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

See attachment

Suggested Modifications:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5086522>

Comment ID **Lpp51**

Site ref (if applicable): **LP0221**

Person ID: **1171108**

Name: **Mr Brian Crossley (SNLPF)**

Organisation: **Chairperson SNLPF**

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

This comment is a duplicate of the comment made against this site under Appendix 1, Site Allocations - Supporting Information as it is not clear which section of the Local Plan should be used. Greenbelt The Greenbelt Site Survey identifies the site as 'medium sensitivity', scoring only two out of the five purposes of Green Belt. The assessment has been carried out in a highly subjective manner resulting in an incorrect and low score. Considering Purpose III, Q2 - 'Is there a strong defensible boundary between the existing urban area and the site?' to which the assessment has answered NO. It is not appropriate to look for natural boundaries such as rivers, roads etc. where Green Belt butts up to the urban area. The boundaries between the urban area to the east and partial urban areas to the north and south are formed by the extents of residential curtilages. A situation that was presumably acceptable in previous planning judgement so it is inappropriate and inconsistent to now define those boundaries as 'indefensible'. The remaining site boundaries do not abut the urban area so are irrelevant. The only correct answer therefore to this question must be YES. Considering Purpose III, Q3 - 'Is there a wildlife designation or value?' to which the assessment has answered NO. This is inconsistent with the LP Policies Map which has designated part of the site as a Wildlife Habitat Network. The only correct answer therefore to this question must be YES. Considering Purpose III, Q5 - 'Is there an ecological or geological/geomorphological designation or value?' to which the assessment has answered NO. This is inconsistent with the Ecology assessment and Natural England determination that there are in fact TWO UK BAP Priority Habitats on the site i.e. Deciduous Woodland and Lowland Meadow. The only correct answer therefore to this question must be YES. Considering Purpose III, Q7 - 'Is the land tranquil?' to which the assessment has answered NO. A site visit will quickly show that the site is almost totally silent except for insects and birds. There is no intrusion from traffic noise and the area is an oasis of tranquillity in this remote corner of the village (see plates

LP0221, 1 to 5 attached). We refer the Inspector to the definition of a tranquil area contained in Annex 4 of this Local Plan document: - 'Tranquil Areas - Areas sufficiently remote from the visual or audible intrusion of development or traffic to be considered unspoilt by urban influences.' The only correct answer therefore to question 7 must be YES. From the above it can be seen that the only possible conclusion is that the site DOES fulfil Green Belt Purpose III, contrary to the result arrived at by the assessment. Considering Purpose IV, Q2 - 'Would the loss of this Green Belt land adversely affect the special character of a historic place or settlement?' and Purpose IV, Q3 - 'Would the loss of this Green Belt land reduce the significance of a historic place or settlement?' to which the assessment answers NO to both. NPPF Para 129 states: - 129. Local planning authorities should identify and assess the particular significance of ANY heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and ANY aspect of the proposal. (our capitalisation) Further, the guidance contained in the Local Plan Greenbelt review states: - 'Contribution to setting of historic place or settlement and cultural heritage. Consideration to be given to the relationship between land being reviewed and designated conservation areas, listed buildings, historic parks and gardens or other important heritage features.' The assessment has only considered a possible impact on the nearby GdII Registered Historic Park and Garden at Shibden Hall. It has neglected to consider any impact on the nearby Northowram Conservation Area from the inevitable development traffic, which Highways DM state would have to pass through it and which would be an inevitable consequence of the loss of this Green Belt site. We submit that a correct Green Belt assessment of this site would come to the only possible conclusion that it fulfils four of the five purposes of Greenbelt instead of the two out of five from the flawed assessment. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. The Local Plan Technical Paper: 'Exceptional circumstances for the release of Green Belt' states that the Plan utilises the emerging National Policy in its approach to exceptional circumstances. Para. 136 of the emerging National Policy states: Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic plan-making authority should have examined fully ALL OTHER REASONABLE OPTIONS for meeting its identified need for development. This will be assessed through the examination of the plan, which will take into account the preceding paragraph, and whether the strategy: makes as much use as possible of suitable brownfield sites and UNDERUTILISED land; (our capitalisation) It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small, UNDERUTILISED sites in urban areas that have been omitted from the plan simply on the grounds of their area. A 'full examination of all reasonable options' should, by definition, have included them. Highways Development Management Highways DM have stated that development traffic would use either Hough or Towngate to access the A58 or A6036. We challenge the view by Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Resident's cars parked near the A58 junction make it especially narrow (see plates LP0221, 6 to 10 attached). Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. Towngate also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being 'unsuitable for HGV's' as shown in the attached photos and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of both development and residential traffic. Conservation/Ecology The site assessment has identified that the site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site as can be seen from our attached photos (see plates LP0221, 3 to 5, 11 & 12 attached) so it is ridiculous to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation which only allows for a

'buffer zone' around the site boundary and ignores large areas of deciduous woodland within the site. It is also not clear what the purpose is of the 10m buffer zone around the edge of the site. What is it a buffer against? Is it intended that this buffer zone becomes the only remaining area of UK BAP Priority Habitat on the site, if so it is woefully inadequate. It cannot be a buffer between development and Priority Habitat because the habitat is being destroyed by development. If it is, sadly, to become the only remaining area of Priority Habitat on site then this should be strengthened by specifying an additional buffer zone (suggest 25m minimum) within the 10m zone, to reduce the possibility of contamination during development and to prevent the encroachment of gardens, colonisation of garden plants, dumping of garden waste and fly tipping on the BAP priority habitat. Such a buffer distance should apply to all development including roads and footways. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached of the impact of development on any species present. Although this requirement normally only relates to a Planning Application, failure to take account of this at this stage may mean that, when a Planning Application is submitted, even though the site is allocated for development in the Local Plan, the presence of species in a UK or Calderdale BAP may mean that the site cannot actually be developed or the anticipated quantum of development is undeliverable. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths as can be seen in the attached photos (see plates LP0221 " 2 to 5, 11 & 12 attached). Additionally, there is a PROW (Calderdale 378) across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. Policy GN1 - Securing green infrastructure provision states (extract): 'The Council will put mechanisms in place to secure Green Infrastructure provision in the Borough. To achieve this, the primary focus will be on: Improving and enhancing existing Green Infrastructure assets, and/or expanding existing, or creating new, Green Infrastructure assets; Encouraging the protection, enhancement and creation of Green Infrastructure through the Development Management System; New development must be served by Green Infrastructure to meet the needs of the prospective residents in a manner which will contribute to the creation of a high-quality environment and provide access to high quality open space for leisure and recreational purposes. Development proposals should ensure that: The Green Infrastructure function of the land is retained and where possible improved; The opportunity is taken to extend and increase Green Infrastructure by linking green spaces, filling in gaps in Green Infrastructure provision, and/or increasing Species and Habitats of Principal Importance.' The proposal for development on LP0221 is not compliant with policy GN1. Policy GN2 - A joined up green infrastructure network states (extract): 'The Council will ensure that the Green Infrastructure network is joined up. Existing spaces should be interlinked allowing biodiversity and humans safe access to, and transit between, a range of valued spaces. To achieve this, decisions upon development proposals shall have particular regard to: Maintaining critical biodiversity assets and providing long term security for these as identified in the Calderdale Biodiversity Action Plan; The proposal for development on LP0221 is not compliant with policy GN2. Policy GN3 " Natural Environment states (extract): 'Development proposals which are likely to have a significant adverse impact on a site with one or more of the following designations, habitats or species will not be permitted except in exceptional circumstances where the reasons for the proposed development clearly outweigh the value of the ecological feature adversely affected and there are no appropriate alternatives: ii Local Wildlife Sites (LWS); iii Calderdale Wildlife Habitat Network (or similar designation); iv Priority habitats and species within the Calderdale Biodiversity Action Plan;' No exceptional circumstances have been put forward and there are many appropriate alternatives therefore the proposal for development is not compliant with policy GN3. Policies GN1, GN2 and GN3 all state, as one of their targets: 'Increase the Borough's woodland cover each year to 2031 (amount to be determined);' The proposal for development of LP0221 is contrary to the stated aims and targets of GN1, GN2 and GN3. Conservation/Heritage Conservation (Heritage) comments have failed to understand or address the full impact of the proposed allocation in the context of Highways DM proposals.

Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering from congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets. NPPF para 129 requires that, when considering how the significance or setting of a heritage asset may be affected, ALL aspects of a proposal must be considered, this must by definition include development traffic. The Conservation (Heritage) assessment is flawed because it has failed to consider if the Highways DM proposals are likely to result in harm to elements which contribute to the significance of a Conservation Area or the Listed Buildings within it. Accessibility We have challenged the accessibility scoring before and we do so again. The site assessment states that modelling from WYCA has been used but since the input data has not been specified for time of day or class of person it is impossible to give a fully developed comment. For example, the journey time to town centre is shown as less than 15mins. Using the WY Metro 'Journey Planner' and assuming elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest bus stop. Similarly, the Journey time to GP is shown as less than 15mins. As there is no suitable bus route to the nearest GP surgery this journey must be on foot, for the same class of person this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and rather than promoting the use of Sustainable transport will force more people to use car journeys to and from these increasingly inaccessible sites. Sustainability The Sustainability Assessment scores only 4 'positive' outcomes out of 17 with 12 outcomes being 'uncertain'. However, the Accessibility RAG scoring has been used to justify the positive outcomes on two of the objectives; SA 3 " 'To create and retain healthy vibrant and inclusive communities' and SA5 " 'To improve accessibility to essential services, facilities and employment'. Referring to our comments above on Accessibility, we believe that the RAG scoring is seriously flawed and thereby calls into question the 'positive' outcomes for SA3 and SA5. If only two (or at most four) of the 17 objectives are positive, we maintain that the site cannot be regarded as sustainable.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the list of allocations until ALL underutilised sites (including those below 0.25ha) have been FULLY considered for allocation

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5052338><http://calderdale-consult.objective.co.uk/file/5052365>

Comment ID **Lpp562**

Site ref (if applicable): **LP0221**

Person ID: **1183442**

Name: **Mr Daniel Cook**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ('To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [' To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that 'exceptional circumstances' must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being 'unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. CONSERVATION/HERITAGE Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets. ACCESSIBILITY The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile

members of society. For example, the journey time to town centre is shown as 'less than 15mins' . Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as 'less than 15mins' . As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites. SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **Lpp681**

Site ref (if applicable): **LP0221**

Person ID: **1183506**

Name: **Mr Thomas Galvin**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ('To assist in safeguarding the countryside from encroachment). The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt ['To preserve the setting and Character of Historic Towns]. If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that 'exceptional circumstances' must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the

Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being 'unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable.

CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation.

CONSERVATION/HERITAGE Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets.

ACCESSIBILITY The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as 'less than 15mins'. Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as 'less than 15mins'. As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites.

SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Remove this site from the local plan.

Additional Evidence Link:

Comment ID **Lpp81**

Site ref (if applicable): **LP0221**

Person ID: **1093075**

Name: **Mrs Alison Cooper**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ('To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [' To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that 'exceptional circumstances' must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being 'unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. CONSERVATION/ECOLOGY The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal

footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation.

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ACCESSIBILITY The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as 'less than 15mins' . Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as 'less than 15mins' . As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites.

SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Main Issues and Council Response

Legal Compliance

Main Issues:

1. Council failed to consider comments made in previous consultations.

Council's Response:

1. Extensive and inclusive consultation has been carried out throughout all stages of the Local Plan preparation process in accordance with the Council's adopted Statement of Community Involvement and is detailed in the Consultation Statement (Regulation 22).

The Regulation 22 Consultation Statement sets out how the comments made during the pre-Publication stages have been taken into account. Specific responses to individual comments have not been made as these are not required by regulations.

Test of Soundness

Main Issues:

1. Local Road Network - Inadequate local road network, specifically congestion, road safety, on-street parking. No evidence of impact on demand for traffic.
2. Infrastructure - Lack of/pressure on existing local infrastructure, e.g., schools, doctors. No evidence of impact on demand for infrastructure.
3. Natural Environment - Destruction of natural environment.
4. Green Belt - Loss of Green Belt. Green Belt assessment is incorrect. Lack of exceptional circumstances. Utilise brownfield sites first.
5. Ecology - Impact on wildlife including UK BAP Priority Habitats and protected species, which have not been reflected in developable area. Protected Species Report should be undertaken prior to allocation. Badger set at Springhead. Suggested mitigation does not go far enough.
6. Heritage - Detrimental impact on Conservation Area and listed buildings not considered in full, including impact from increased traffic.
7. Accessibility - Journey times are significantly underestimated.
8. Sustainability Appraisal - The results of the SA are based on flawed accessibility scores.
9. Open Space - Allocation of site will not comply with policies on green infrastructure. Capacity of other open spaces. Loss of most suitable open space in the area.
10. Landscape - Impact on character and special features of Shibden Valley (Special Landscape Area).
11. Pollution - Impact on air and light pollution.
12. Health - Impact on health and wellbeing.
13. Site Selection - The site has not been assessed fairly and consistently when compared to other sites. There are more suitable sites in other areas of Halifax.
14. Site Assessment - Detailed assessments should be undertaken prior to allocation. Measures to mitigate against negative effects identified in the Site Report have not been identified.
15. Flooding - Increased risk of flooding. Flood Risk Assessment should be undertaken prior to allocation.
16. Land Stability - Topography will create land stability issues when creating foundations.

Council's Response:

1. The Highways Development Management Section has commented that access is possible from the existing residential road, Windmill Drive. Current guidance indicates that a road of this type and geometry would be suitable subject to minor mitigation measures. The Transport Assessment in any planning application would address impacts on the immediate area and identify any road layout changes.
2. The Infrastructure Delivery Plan is a compendium of projected infrastructure provision and it helps to

ensure that this infrastructure is provided in a timely manner and in a coordinated and sustainable way. It sets out the infrastructure that will support the level of development that is proposed in the Calderdale Local Plan.

3. West Yorkshire Ecology, Natural England and the Council's Conservation officer (Ecology) have been consulted on the proposed allocation of this site. In light of the Deciduous Woodland and Wildlife Habitat Network which adjoin the site, it is recommended that the developable area is reduced by providing a buffer of 10m around the site and around the woodland within the site. A Protected Species Survey would also be required and various mitigation measures have been suggested.

4. Document EV 09 Exceptional Circumstances for the Release of Green Belt (2018) considers the process that the Council has followed in relation to the potential need to release land from the Green Belt. It can be seen that a methodical approach has been built into each stage of the process and that ultimately this process has dovetailed with the Government's emerging policy on exceptional circumstances. The proposed changes to the Calderdale Green Belt are clearly a last resort and have been minimised. Furthermore, the boundary changes are essential to achieving a sustainable future for Calderdale – one that reconciles economic, social and environmental sustainability. With regards to the site assessment process, in order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area, only using the most sensitive Green Belt when all alternative sites were used. It is considered that the exceptional circumstances have been demonstrated to justify the proposed changes to the Calderdale Green Belt boundary.

5. West Yorkshire Ecology, Natural England and the Council's Conservation officer (Ecology) have been consulted on the proposed allocation of this site. In light of the Deciduous Woodland and Wildlife Habitat Network which adjoin the site, it is recommended that the developable area is reduced by providing a buffer of 10m around the site and around the woodland within the site. A Protected Species Survey would also be required and various mitigation measures have been suggested.

6. Historic England has highlighted that development of this area could impact upon the setting of the Grade II Registered Historic Park and Garden at Shibden Hall. The Council's Conservation Section (Heritage) has suggested that any impact could be mitigated by the retention of the boundary trees, resulting in a complete screening of the site.

7. Accessibility modelling has been undertaken by West Yorkshire Combined Authority which takes into account the most recent integrated transport networks and public transport timetables. The methodology used for assessing accessibility is within the appendices of the Site Assessment Methodology document.

8. The SA is part of the Local Plan preparation process and its purpose is to inform the development of the plan; it is not the sole contributor to proposing or rejecting site allocations. The methodology for assessing the impacts was part of the SA Framework that has been developed over a number of years. The SA Framework has been subject to a number of public consultations.

9. The site performs the function of a natural/semi-natural open space. An assessment of open space in the area shows that there are sufficient alternative natural/semi-natural areas within the catchment of this site to meet the adopted standards. The requirements to offset the impact of any development on existing open space facilities will be assessed on submission of a planning application. The visual impact of any development should be considered and the public right of way through the site should be safeguarded.

10. Historic England has highlighted that development of this area could impact upon the setting of the

Grade II Registered Historic Park and Garden at Shibden Hall. The Council's Conservation Section (Heritage) has suggested that any impact could be mitigated by the retention of the boundary trees, resulting in a complete screening of the site.

11. Environmental Health has been consulted on the potential allocation of this site for development and has stated that whilst there are no major issues, a stand off between the quarry boundary and the site is necessary. Issues relating to air and light pollution have not been raised.

12. Health and wellbeing policies are detailed in Chapter 12: Health and Wellbeing of the Local Plan. A health impact assessment (HIA) helps ensure that health and wellbeing are being properly considered in planning policies and proposals. The policies and proposals of the Local Plan have been subject to HIA through the Sustainability Appraisal that was undertaken prior to its publication.

13/14 All sites assessments have been carried out in a consistent manner following the Site Allocations Assessment Methodology Statement, Publication Draft 2018 (EV51.1).

15. The site lies within Flood Zone 1, however, given the size and greenfield status of the site, a Flood Risk Assessment would be required in order to assess any risk of flooding and propose mitigation measures to reduce such risks.

16. The site is not located in an area of designated unstable land. However, if evidence comes to light demonstrating land stability issues at the site, a Land Stability Report will be required at the planning application stage.

Duty to Co-operate

Main Issues:

Council's Response:

Suggested Modifications

1. Local Highway Network - Add right turn at Upper Lane/Heywood Close junction although this could lead to road safety issues.
2. The site should be removed from the Local Plan.
3. Consider all under utilised sites (including under 0.25ha) before allocating this site.
4. Strengthen protection of the woodland by using a 25m buffer.
5. Add Heritage Impact Assessment on potential affect on significance on Registered Park & Garden, to Reports Required section, to comply with NPPF.
6. The Plan should include details of mitigation measures.
7. Protected Species Report should be undertaken prior to allocation.

Council's Response:

1. The Highways Development Management Section has commented that access is possible from the existing residential road, Windmill Drive. Current guidance indicates that a road of this type and geometry

would be suitable subject to minor mitigation measures. The Transport Assessment in any planning application would address impacts on the immediate area and identify any road layout changes.
No modification required.

2. No change required - The site's allocation is considered consistent with the Council's site allocation methodology and positioning in the trajectory as set out in the Housing Technical Paper.

3. Sites which were below 0.25 hectares were filtered from allocation. Many other local authorities have traditionally used a site size of 0.4 hectares, however due to the important contribution of small sites historically in Calderdale it is believed a 0.25 hectare threshold is more appropriate. Planning Practice Guidance states that a range of different sized sites will be required to deliver the required scale of development. It suggests that sites should be assessed which could support 5 or more dwellings or economic development sites of 0.25 hectares. Sites below 0.25 ha are likely to come forward as windfalls where an assumption has been made as to their contribution to housing numbers. Where appropriate, sites below 0.25 hectares have been amalgamated with another site to take it above the site size threshold. These smaller sites also have the opportunity to be allocated as part of Neighbourhood Plans.
No modification required.

4. West Yorkshire Ecology, Natural England and the Council's Conservation Officer (Ecology) have been consulted on the proposed allocation of this site. In light of the Deciduous Woodland and Wildlife Habitat Network which adjoin the site, it is recommended that the developable area is reduced by providing a buffer of 10m around the site and around the woodland within the site. This has been included as a site specific consideration.
No modification required.

5. Historic England has highlighted that development of this area could impact upon the setting of the Grade II Registered Historic Park and Garden at Shibden Hall. The Council's Conservation Section (Heritage) has suggested that any impact could be mitigated by the retention of the boundary trees, resulting in a complete screening of the site.
No modification required.

6. The Local Plan includes a wide range of mitigation measures.
No modification required.

7. The Council's Conservation Officer (Ecology) has recommended that a Protected Species Survey is completed before the site is developed. This has been included as a site specific consideration.
No modification required.

Representations

Comment ID **APX177**

Site ref (if applicable): **LP0589**

Person ID: **1130909** Name: **Mr Muhammad Azhar Ullah** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "" "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site "" 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements,

difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX342**

Site ref (if applicable): **LP0589**

Person ID: **1182204**

Name: **Mr Nicholas Allan**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. Conservation/Ecology The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote

and preserve through its various GI policies but does nothing to support with this proposed allocation. Conservation/Heritage Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets. Accessibility The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" Using the WY Metro 'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as "less than 15mins" As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX448**

Site ref (if applicable): **LP0589**

Person ID: **1024937**

Name: **Mr Ian Sanderson**

Organisation: **Principal Archaeologist
West Yorks Archaeology
Advisory Service**

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Need to add Heritage Impact Assessment on potential impact on significance of Conservation Area, to Reports Required section, to comply with NPPF (para. 189).

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

See above

Additional Evidence Link:

Comment ID **APX54**

Site ref (if applicable): **LP0589**

Person ID: **1129112**

Name: **Mr Kevin Firth**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose III of the five purposes of greenbelt ("To assist in safeguarding the countryside from encroachment) . The land is tranquil and the Site Assessment correctly identifies that it has both a Wildlife and Ecological Designation therefore I submit that it clearly fulfils Purpose III. The Greenbelt assessment is incorrect because it states that the site does not fulfil Purpose IV of the five purposes of greenbelt [" To preserve the setting and Character of Historic Towns] . If the site is removed from Greenbelt the inevitable development traffic passing through the narrow streets of the nearby Conservation Area, would have a negative impact on the significance and setting of the Conservation Area and listed buildings within it. (See also my comments below under Highways Development Management and Conservation/Heritage). NPPF para 83 requires that "exceptional circumstances" must be demonstrated before land is taken out of the Greenbelt. No such circumstances have been stated therefore the proposal is non-compliant. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM have stated that Development traffic would use either Hough or Towngate to access the A58 or A6036. I disagree with the view of Highways DM that the Hough/A58 junction is in any way suitable to allow HGV access/egress to this site. Hough is a very steep, narrow, cobbled street with a sharp, blind bend. Cars parked near the A58 junction make it especially narrow. Towngate is a narrow street with resident's cars necessarily parked on both sides, frequently leading to traffic congestion. It also has a pinch point and speed bumps to restrict traffic flow. Hough and Towngate are signed as being "unsuitable for HGV's and both streets pass through the Northowram Conservation Area which would inevitably suffer through increased volumes of development and residential traffic. Highways DM have only considered the increased amount of residential traffic on Windmill Drive, they have failed to give any consideration to its suitability to accommodate development traffic, for which it is totally unsuitable. Conservation/Ecology The site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Lowland Meadow. The woodland is primarily Oak, but other deciduous species exist. The habitats are spread consistently across the entire site so it is erroneous and misleading to suggest that they are restricted to discreet pockets within the site or at the site margins. The assessment calls for a 10m buffer zone around the site boundary and, importantly, around the woodland within the

site. However, this has not been reflected in the proposed developable area shown on the site allocation, which only allows for a buffer zone around the site boundary and ignores large areas of deciduous woodland within the site. The site assessment calls for a Protected Species Report but, given that the site is Greenbelt, the site should not be allocated until such a report has been produced and a full understanding is reached on the impact of development on any species present. The site is locally important as a tranquil area used for walking and gentle recreation. It is criss-crossed by several informal footpaths and there is a Public Right of Way across the northern end of the site. Because the site is tranquil, contains the two BAP Priority Habitats and is easily accessible, it is an important Green Infrastructure Asset for Northowram, something that the Local Plan claims to promote and preserve through its various GI policies but does nothing to support with this proposed allocation. Conservation/Heritage Conservation (Heritage) comments have failed to consider the full impact of the proposed allocation in the context of Highways DM proposals. Highways DM propose that development traffic will use Towngate and Hough to access/egress the site. Both streets pass through the Northowram Conservation Area. Towngate is a narrow village street, already suffering congestion from cars and along which are several listed buildings fronting the street. Hough is a very steep, in places narrow, cobbled street. Both Towngate and Hough are signed as being unsuitable for HGV's which would be ignored if development traffic has to pass along it, to the possible detriment to Heritage Assets. Accessibility The journey times given in the Site Assessment are significantly underestimated and ignore the less mobile members of society. For example, the journey time to town centre is shown as "less than 15mins" Using the WY Metro'Journey Planner' and for the elderly, disabled or young families walking slowly the time is 40mins and involves a walking journey of 800m to the nearest frequent bus stop. Similarly, the Journey time to GP is shown as "less than 15mins" As there is no suitable bus route to the nearest GP surgery this journey must be made on foot. For the elderly, disabled or young families walking slowly this will take 24mins and involve a walking distance of 1.2km. Clearly these accessibility times ignore the less mobile members of society and, rather than promoting the use of Sustainable transport, will force more people to use car journeys to and from these increasingly inaccessible sites. Sustainability The Sustainability Assessment only scores 4'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX571**

Site ref (if applicable): **LP0589**

Person ID: **1121289**

Name: **Mr Tony Hubbert**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

There is no detail to explain the consideration in demand on traffic and schools

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX65**

Site ref (if applicable): **LP0589**

Person ID: **1116616**

Name: **Mrs Susan Thompson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but

couldn't accommodate traffic from the whole site "" 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." "Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc.

CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings.

CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations.

ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" "Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" "stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE.

Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX682**

Site ref (if applicable): **LP0589**

Person ID: **10978**

Name: **Mr Ian Smith**

Organisation: **Historic England**

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

This site lies close to the boundary of the Northowram Village Conservation Area. The Heritage Impact Assessment considered that Development would change the character of the site by adding built form into the streetscene. It also felt that there was the potential for large-scale development along the road frontage to dominate views north to the detriment of the gateway into the historic part of the village. Historic England would concur with that analysis and with the assessment of the degree of harm that the development of this site would be likely to cause. Historic England would also endorse the mitigation measures which have been put forward in the Heritage Impact Assessment and considers that these are likely to be effective in reducing the harm to the level indicated. However, in order to reduce the potential harm to that level, the mitigation measures which the Heritage Impact Assessment has put forward need to be implemented as part of any future development proposals for this area. Unfortunately, as worded, all a potential developer has to do is to 'consider' the recommendations that have been put forward in the Heritage Impact Assessment. There is no requirement, at all, for them to actually design a scheme with takes account of, and puts into effect, the recommended mitigation measures. Therefore, as currently worded, the Site Specific Consideration insofar as it relates to the historic environment is Unsound as it is not likely to be effective.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Site LP0589 amend the fifth Site Specific Consideration to read:- "Implementation of the mitigation measures set out in the Heritage Impact Assessment"²

Additional Evidence Link:

Comment ID **APX762**

Site ref (if applicable): **LP0589**

Person ID: **1176584** Name: **Mr Leslie Dawson** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

There is inadequate justification for removing area from Greenbelt land and it will have a negative impact on the environment and wildlife. The road to the front of this proposed development is already extremely busy at peak periods, I feel access too and from this development at this point would create a potential accident black spot, and increase traffic problems for the emergency services etc. Traffic noise levels in this area are already a problem and this would inevitably add to it.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX873**

Site ref (if applicable): **LP0589**

Person ID: **1130687** Name: **Miss Kate Oworm** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

This land is the only remaining green space between the recreational ground and the A6036. Destruction of this woodland will mean a loss of life and habitat for wildlife. Increased emissions will damage vegetables and fruit grown in the adjacent allotment and could lead to lethal amounts of contaminants within the food. An increase in traffic causes a strain on the existing infrastructure. There are several blind spots exacerbated by Parker vehicles. Increased congestion could lead to even more accidents.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

remove this site from the local plan.

Additional Evidence Link:

Main Issues and Council Response

Legal Compliance

Main Issues:

Council's Response:

Test of Soundness

Main Issues:

1. Infrastructure - No detail to explain how increased traffic levels or demand for additional school places have been considered.
2. Heritage - Recommendations in HIA should be 'required' in order to be effective.
3. Local Road Network - Inadequate local road network, specifically road safety issues, on street parking and congestion.
4. Ecology - Impact on wildlife including loss of woodland.
5. Pollution - Impact of development on air and noise (from traffic) pollution.

Council's Response:

1. The Infrastructure Delivery Plan is a compendium of projected infrastructure provision and it helps to ensure that this infrastructure is provided in a timely manner and in a coordinated and sustainable way. It sets out the infrastructure that will support the level of development that is proposed in the Calderdale Local Plan.
2. The mitigation measures identified within the HIAs are recommendations to be considered by applicants and Development Management case officers. At the time of a full application submission, applicants may wish to submit a further HIA, which may make varying recommendations in terms of mitigation. It is considered that to 'require' the mitigation measures included within the HIAs would be unnecessarily prescriptive where in practice; other measures may achieve a similar result.
3. The Highways Development Management Section considers that a development of this size will not have a material impact on the local road network and amendments to the existing junction would be possible to enable suitable access to the site.
4. There are no ecological constraints associated with the site, it has however been recommended that in order to mitigate the impacts of development, the boundaries should be planted with locally native species-rich hedgerows.

5. In light of the location of the site in relation to Bradford Road (A6036), Environmental Health has commented that consideration would need to be given to the impact of road traffic noise on dwellings and their private amenity spaces. Therefore a Noise Impact Assessment will be required at planning application stage.

In terms of air quality, the site is situated within relatively close proximity to the Stump Cross Air Quality Management Area and as such, mitigation would be appropriate to address air quality impacts. The impact of road traffic emissions on the residential development itself however would not be expected to be significant, and no breach of the air quality objectives for nitrogen dioxide and particulate matter is expected on the site.

Duty to Co-operate

Main Issues:

Council's Response:

Suggested Modifications

1. Recommendations in HIA should be 'required' in order to be effective.
2. The site should be removed from the Local Plan.

Council's Response:

1. The mitigation measures identified within the HIAs are recommendations to be considered by applicants and Development Management case officers. At the time of a full application submission, applicants may wish to submit a further HIA, which may make varying recommendations in terms of mitigation.

It is considered that to 'require' the mitigation measures included within the HIAs would be unnecessarily prescriptive where in practice; other measures may achieve a similar result.

No modification required.

2. No change required - The site's allocation is considered consistent with the Council's site allocation methodology and positioning in the trajectory as set out in the Housing Technical Paper.

Representations

Comment ID

Site ref (if applicable): **LP0759**

Person ID: **1128132** Name: **Miss Janine Benner** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholmegate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment

acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE. CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX243**

Site ref (if applicable): **LP0759**

Person ID: **1128130**

Name: **Mr Ian Thewliss**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access

the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars.

CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure.

SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE.

CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX570**

Site ref (if applicable): **LP0759**

Person ID: **1121289** Name: **Mr Tony Hubbert** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

There is no detail to explain the consideration in demand on traffic and schools

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX754**

Site ref (if applicable): **LP0759**

Person ID: **1118097** Name: **Mrs Sarah Jones** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

This land although a relatively small area is important for wildlife as it forms a part of the wildlife corridor between Shelf and Queensbury to the north. The adjacent fishing lakes are home to many species of birds including barn owls, tawny owls, geese, duck and even heron. There are also various bat colonies in the area. This area of proposed development will bring housing and noise nearer to the lakes and will be likely to drive away such wildlife. The present area of undeveloped land also acts as a buffer zone between the Belle Vue estate and the fishing lakes. If it is developed there will be great visual detriment to the area. Presently bungalows border the estate and they are not prominent in the landscape, being largely screened by the trees of the fishing lakes. Hence the backdrop to the lakes tends to be one of trees and shrubbery. Furthermore this small patch of green space represents the last green space on the Belle Vue estate. In addition to possibly losing this land the residents have only recently lost the recreational use of a field adjoining the estate and bordering Cock Hill Lane. This has now been fenced off from the public. Therefore this last patch of greenery needs to be preserved.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Remove from local plan

Additional Evidence Link:

Comment ID **Lpp1080**

Site ref (if applicable): **LP0759**

Person ID: **977466**

Name: **Mr & Mrs Jean & Steven Sanderson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

See attachment

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5081691>

Comment ID **Lpp415**

Site ref (if applicable): **LP0759**

Person ID: **1113733**

Name: **Mr Derek Bennett**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

I am particularly concerned regarding development of this green space which is part of the wildlife corridor linking the West Street area of grassland to the fields to the north towards Queensbury. Part of this planned development would also border the fishing lakes off Cock Hill Lane (also part of the wildlife corridor). These lakes are frequented by herons, geese and various species of duck. I have also seen deer in

the area amongst other wildlife. At night the area can be the habitat of barn owls, tawny owls and various bat species. The problem with the development proposal is that housing would form a barrier to the wildlife corridor where it borders the fishing lakes. As such the area would lose its wildlife permanently. This loss would be further impacted by the development also proposed to the north of some 500 houses also on greenbelt land and also part of this corridor. If one takes into account the further proposal to develop the grass land at West Street then the wildlife in the area would be effectively excluded. The planners talk about the necessity of providing alternative wildlife habitat in the area but it is difficult to envisage the possibility of this when one takes into account the scale of their development proposals for this area as a whole. Furthermore the planners fail to offer a plausible means of delivery of these alternatives. In addition to the massive potential impact on the wildlife and ecology there is also the impact of the development on housing density. Although this is a relatively small development of some 16 homes it is the very small scale of presently undeveloped land that is so important. The Belle Vue Estate of which this is a part now has no undeveloped land except for this. It is a relatively densely packed housing area and this land is important as the last green space area. Visually it forms a green border cushioning the visual housing impact from the fishing lakes off Cock Hill, previously mentioned. A small area of development BUT all the more important for that. The plus side for development would only be a handful of homes whereas the loss would be so substantial. I therefore plead this little patch of land be saved for ecology and wildlife both for now and the future.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This land should be removed from the development plan.

Additional Evidence Link:

Main Issues and Council Response

Legal Compliance

Main Issues:

Council's Response:

Test of Soundness

Main Issues:

1. Infrastructure - No detail to explain how increased traffic levels or demand for additional school places have been considered. Lack of/pressure on existing amenities, services and facilities in the local area, e.g. schools, doctors, sports facilities.
2. Ecology - Impact on UK BAP Priority Habitat, Open Space, Wildlife Corridor and bats.
3. Landscape – Visual impact of development on area.
4. Open Space - Loss of open space.

5. Local Road Network - Inadequate Local Road Network, specifically narrow approach roads, inadequate footpaths, congestion, on-street parking and cumulative impacts with other sites.
6. Sustainability Appraisal - The results of the SA are based on flawed accessibility scores. Site only scores positively in two of the objectives.
7. Site access - Constraints mean site access is unsuitable.
8. Heritage - Impact on heritage assets.
9. Flooding - Building on greenfield sites will increase surface water flooding.

Council's Response:

1. The Infrastructure Delivery Plan is a compendium of projected infrastructure provision and it helps to ensure that this infrastructure is provided in a timely manner and in a coordinated and sustainable way. It sets out the infrastructure that will support the level of development that is proposed in the Calderdale Local Plan.
2. There would be no significant impact on environmentally sensitive areas should the land be developed. The site is however within Calderdale's Wildlife Habitat Network, mitigation measures have therefore been suggested by the Conservation Section (Ecology) and will be carried forward as site specific considerations.
3. The site is not situated within a Special Landscape Area. However, chapter 20 of the Local Plan contains a Landscape Character policy which ensures that new development is designed in a way that is sensitive to its landscape setting, retaining and enhancing the distinctive qualities of the landscape area in which it would be situated.
4. Whilst the site is classed as Amenity Green Space in the Open Space Study, the land is not designated Open Space, as such the site is not protected by policy. Removing the site on this basis would therefore be unreasonable.
5. The Highways Development Management Section considers that an appropriate access is achievable and despite concerns being raised during the consultation regarding traffic impact, this would be small given the size of the site.
6. The SA is part of the Local Plan preparation process and its purpose is to inform the development of the plan; it is not the sole contributor to proposing or rejecting site allocations. The methodology for assessing the impacts was part of the SA Framework that has been developed over a number of years. The SA Framework has been subject to a number of public consultations.
7. The Highways Development Management Section considers that an appropriate access is achievable and despite concerns being raised during the consultation regarding traffic impact, this would be small given the size of the site.
8. The nearest listed building is a row of cottages at 3-7 Cock Hill, located to the north-west of the site but standing somewhat detached from the surrounding existing residential development. The site is screened from the listed cottages by the existing housing, and the site appears to have no physical or functional relationship with the listed building, nor does it provide a setting to the listed building. It is therefore considered that the development of this site is unlikely to result in harm to any designated heritage asset.

9. The Flooding and Drainage Section has commented that because of surface water flooding and the sloping nature of the site, development would be acceptable providing the layout and design would avoid flood risk impacts. It has also been noted that SuDS should be provided to maximise infiltration and storage of rain water.

Duty to Co-operate

Main Issues:

Council's Response:

Suggested Modifications

1. Remove site LP0759 from the Local Plan.

Council's Response:

1. No change required - The site's allocation is considered consistent with the Council's site allocation methodology and positioning in the trajectory as set out in the Housing Technical Paper.

Document Section: LP0782 - New Housing Site - Northowram and Shelf

Representations

Comment ID **APX100**

Site ref (if applicable): **LP0782**

Person ID: **1180033** Name: **Mrs. Tessa Drury** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Green belt land that should not be built on. Infrastructure inc. roads not suitable for this amount of housing. Important wildlife corridor.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Additional Evidence Link:

Comment ID **APX1013**

Site ref (if applicable): **LP0782**

Person ID: **1183702** Name: **Mr Frank Hand** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but

no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "" "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site "" 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on

one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX1032**

Site ref (if applicable): **LP0782**

Person ID: **1183808**

Name: **Mr David Dyson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT

sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. 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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX106**

Site ref (if applicable): **LP0782**

Person ID: **1181126**

Name: **Mrs Jennifer Harkness**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on

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Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation (Heritage) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. Conservation (Ecology) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. 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However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed

Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX1064**

Site ref (if applicable): **LP0782**

Person ID: **228336**

Name: **Yorkshire Wildlife Trust**

Organisation: **Yorkshire Wildlife Trust**

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

We are encouraged to see requested species specific surveys, however would also like to see full PEA and other appropriate protected species surveys; in addition to sensitive landscape schemes to ensure no impacts to LWS or fragmentation of CWHN. Sensitive lighting schemes and net gain in biodiversity should also be implemented. Full assessment of impacts to LWS will be needed along with appropriate mitigation.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5078786>

Comment ID **APX116**

Site ref (if applicable): **LP0782**

Person ID: **1094062**

Name: **Miss Helga Oates**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV " "To preserve the setting and special character of historic towns" "As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." "Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation (Heritage) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. Conservation (Ecology) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-

create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX119**

Site ref (if applicable): **LP0782**

Person ID: **717396**

Name: **Mrs Hoare**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV " "To preserve the setting and special character of historic towns" "As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." "Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation (Heritage) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. Conservation (Ecology) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" "Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX123**

Site ref (if applicable): **LP0782**

Person ID: **1117675**

Name: **Mr Peter Hoare**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the

five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. 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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX130**

Site ref (if applicable): **LP0782**

Person ID: **1171108**

Name: **Mr Brian Crossley (SNLPF)**

Organisation: **Chairperson SNLPF**

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt We accept that the site already scores as 'high sensitivity' in the Greenbelt Review 2016, scoring 4 out of the five purposes of Greenbelt, and that a positive scoring on further purposes will not change that. However, we feel we must comment on the inconsistent and entirely subjective assessment results which have concluded that the site does not fulfil Purpose IV "" "To preserve the setting and special character of historic towns" Our reasons for this are: - Considering Purpose IV, Q2 "" " Would the loss of this Green Belt land adversely affect the special character of a historic place or settlement" The site is

directly opposite the GdII listed buildings at 3-7 Cockhill, separated only by the narrow Cockhill Lane, yet the assessment answers NO to this question. Considering Purpose IV, Q3 " " Would the loss of this Green Belt land reduce the significance of a historic place or settlement" As stated above, the site is directly opposite the GdII listed buildings at 3-7 Cockhill, separated only by the narrow Cockhill Lane, yet the assessment answers NO to this question. However, the assessment then concludes that development - " Would have an effect on the setting and special character of historic features which could be mitigated against" The answers and conclusion are quite clearly contradictory. To require mitigation there must be an effect that is being mitigated against, in this case loss of setting or significance. The need for any future, and as yet unspecified mitigation is not relevant to the questions being asked but the assessor has used subjective judgement to arrive at the answer that best supports a desired outcome. It follows then that the answers to Q2 and Q3 must be YES, and therefore the overall result must be that the site DOES fulfil Purpose IV and thereby fulfils ALL FIVE Purposes of Green Belt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. The Local Plan Technical Paper: "Exceptional circumstances for the release of Green Belt" States that the Plan utilises the emerging National Policy in its approach to exceptional circumstances. Para. 136 of the emerging National Policy states: Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic plan-making authority should have examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of the plan, which will take into account the preceding paragraph, and whether the strategy: makes as much use as possible of suitable brownfield sites and underutilised land; It is difficult to see how there may be exceptional circumstances in favour of development when there are numerous small, underutilised sites in urban areas that have been omitted simply on the grounds of their area. A 'full examination of all reasonable options' should, by definition, have included them. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. The site is on the northern most fringe of Shelf. We refer to 'Report no 70018699-02 - Calderdale Local Plan Transport Evidence, Technical Note 1: Future Network Baseline Dated June 2016', which shows that it is outside the 400m buffer zone of proximity to a high frequency bus service. We also refer to the Calderdale Core Transport Strategy Study " "Appraising the Approaches to Future Development" By Stear, Davies, Gleave dated January 2010, extracts from which are given below, of particular note are the comments contained in paras 5.8.1 and 5.8.3 We submit that, distant as it is from access to public transport and other services this site CANNOT be considered to be sustainable and therefore the proposal is non-compliant with current National Policy. Highways Development Management In their assessment of site LP1543 (Land North of Wade House road), which Highways DM are linking to this site, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site but couldn't accommodate traffic from the whole site - 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely they have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would add a further 165 houses to the 330 on LP1543. The council has not explained why the combined volume (495 houses) is not being considered for LP0782. Development of LP1543 and LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic interacting with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cockhill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. (see plates LP0782-1 to 4 attached). Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to point out that development of these sites is unsustainable. It is claimed that traffic impact for

LP1543 and LP0782 (by linking) is being considered at a strategic level but Highways DM have failed to show any detail of, or seemingly to even consider, the cumulative impact of these sites on the Local Highway Network (LHN). Any proposed interventions must explain in detail the interaction between the new highway network within the sites, and its connections with the local highway network immediately around them (and then the strategic highway network beyond). Proposals for site access are unrealistic and the cumulative impact on the local highway network has not been assessed. Judgements about the capacity of the LHN are unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. We can see some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation (Heritage) Listed Buildings at 3-7 Cockhill Lane are adjacent to the west but the Site Assessment only makes a vague reference to a 'buffer strip' along the western boundary of the site to mitigate any impact on the setting and significance of the heritage asset. Due to the topography, the width and treatment of the strip is critical but the Council has failed to give any more detail, without more detail it is impossible to make a valued comment. The Council have also failed to specify a future designation for the vaguely referenced 'buffer strip'. The policies map does not identify that it will remain in Green Belt with the supposed protection from development associated with that designation. Indeed, such a narrow strip is discouraged in NPPF and would leave it susceptible to re-designation in future plan versions. Without a robust policy to protect this strip it would be under constant pressure from developers wishing to build right up to Cock Hill Lane. Conservation (Ecology) The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved species rich grassland but it is not defined as to how or where this may be created in the local area. The mitigation measures should be fully identified and stated BEFORE release of this site from Greenbelt as failure to define it at this stage may mean that, when a planning application is submitted, the site cannot actually be developed due to a lack of suitable mitigation sites. The site also supports a priority species listed in the Calderdale BAP (2003-2010, awaiting update). Policy GN3 "" Natural Environment states (extract): "Development proposals which are likely to have a significant adverse impact on a site with one or more of the following designations, habitats or species will not be permitted except in exceptional circumstances where the reasons for the proposed development clearly outweigh the value of the ecological feature adversely affected and there are no appropriate alternatives: ii Local Wildlife Sites (LWS); iii Calderdale Wildlife Habitat Network (or similar designation); iv Priority habitats and species within the Calderdale Biodiversity Action Plan;" No exceptional circumstances have been put forward and there are many appropriate alternatives therefore the proposal for development is not compliant with policy GN3. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" We would go further and suggest that a full species survey is required to identify the range of flora and fauna present in this area of semi-improved grassland. The Local Plan must also identify positively where 'locally native species rich unimproved grassland' may be provided as mitigation in the local area. Additionally, it is counter-productive that development must restore a gap in the WHN when it is the very development that is creating such a gap. Given that the site is Greenbelt and requires exceptional circumstances to justify its removal from the Greenbelt, a habitat and species assessment should be carried out BEFORE allocation. A Protected Species Report has not been called for in the site assessment but failure to take account of this at this stage may mean that, when a Planning Application is submitted, even though the site is allocated for development in the Local Plan, the presence of species in a UK or Calderdale BAP may mean that the site cannot actually be developed or the anticipated quantum of development is undeliverable. Accessibility We agree with the 'Distance to Bus Stop' of between 400m and 2km. However, we disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as

"less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40-41mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is seriously flawed. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG has failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic interacting with the various classes of pedestrians, most notably elderly, disabled or school children. Since journey times and distances for several other Accessibility categories involve bus journeys and walking to the bus stop then they must also now be regarded as seriously flawed. Putting aside journey times for the moment, we submit that forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety. Sustainability The Sustainability Assessment scores only 4 'positive' outcomes out of 17 with 12 outcomes being 'uncertain'. However, the Accessibility RAG scoring has been used to justify the positive outcomes on two of the objectives; SA 3 " "To create and retain healthy vibrant and inclusive communities" and SA5 " "To improve accessibility to essential services, facilities and employment" Referring to our comments above on Accessibility, we believe that the RAG scoring is seriously flawed and thereby calls into question the 'positive' outcomes for SA3 and SA5. If only two (or at most four) of the 17 objectives are positive, we maintain that the site cannot be regarded as sustainable. Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents of this site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other parts of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the list of allocations until ALL underutilised sites (including those below 0.25ha) have been FULLY considered for allocation.

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5052370>

Comment ID **APX148**

Site ref (if applicable): **LP0782**

Person ID: **1128154**

Name: **Mrs Cat Horsfall**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV " "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation (Heritage) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. Conservation (Ecology) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and

2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins". Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing. Other concerns: Flood risk/Landslide - my concern is for the properties below this farm land (Dovedale Close, Eskdale Avenue, Wharfedale Mount) and what impact extended building would have i.e. clay soil disturbed may increase the risk of flooding and/or landslide from this hillside.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This should be removed from the local plan

Additional Evidence Link:

Comment ID **APX149**

Site ref (if applicable): **LP0782**

Person ID: **1128288**

Name: **Mrs Lorraine Cornwell**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV " "To preserve the setting and special character of historic towns" "As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." "Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation (Heritage) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. Conservation (Ecology) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" "Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX153**

Site ref (if applicable): **LP0782**

Person ID: **1181790**

Name: **Mrs Linda Briggs**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7

Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. 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Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. 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However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX157**

Site ref (if applicable): **LP0782**

Person ID: **1121443**

Name: **Mrs Christine Moussavi**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV " "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of

development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. 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steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX162**

Site ref (if applicable): **LP0782**

Person ID: **1116568**

Name: **Mrs Pauline Stead**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt

boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. 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Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. 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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX165**

Site ref (if applicable): **LP0782**

Person ID: **1118015**

Name: **Mr Michael Halliday**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV " "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a

narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." "Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc.

CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings.

CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations.

ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" "Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" "stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX172**

Site ref (if applicable): **LP0782**

Person ID: **1124475**

Name: **Mr Peter Horne**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX178**

Site ref (if applicable): **LP0782**

Person ID: **1130909** Name: **Mr Muhammad Azhar Ullah** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX182**

Site ref (if applicable): **LP0782**

Person ID: **1131102**

Name: **Mr Phil Taylor**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX183**

Site ref (if applicable): **LP0782**

Person ID: **1131102**

Name: **Mr Phil Taylor**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "" "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site "" 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX187**

Site ref (if applicable): **LP0782**

Person ID: **1131193**

Name: **Mrs Susan Taylor**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation (Heritage) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. Conservation (Ecology) The site is farmland, currently used for

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX189**

Site ref (if applicable): **LP0782**

Person ID: **1131193**

Name: **Mrs Susan Taylor**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation (Heritage) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. Conservation (Ecology) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX192**

Site ref (if applicable): **LP0782**

Person ID: **1126186**

Name: **Mr Andrew Spence**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX196**

Site ref (if applicable): **LP0782**

Person ID: **1181811**

Name: **Mr Simon Horsfall**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV " "To preserve the setting and special character of historic towns" "As a site that fulfils ALL FIVE

purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation (Heritage) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. Conservation (Ecology) The site is farmland, currently used for grazing and hay production. 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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Additional Evidence Link:

Comment ID **APX200**

Site ref (if applicable): **LP0782**

Person ID: **1128288**

Name: **Mrs Lorraine Cornwell**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX205**

Site ref (if applicable): **LP0782**

Person ID: **1129582**

Name: **Mr Graham Shaw**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX208**

Site ref (if applicable): **LP0782**

Person ID: **1181859**

Name: **Mr Kevin Cornwell**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX214**

Site ref (if applicable): **LP0782**

Person ID: **1181903**

Name: **Mr Desmond Gee**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "Cock Hill Lane could provide a link through to the adjacent site

[LP1543] but couldn't accommodate traffic from the whole site "" 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." "Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation (Heritage) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. Conservation (Ecology) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" "Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" "stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX217**

Site ref (if applicable): **LP0782**

Person ID: **1121702**

Name: **Mrs Lisa Izzard**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

My comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able

to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc.

CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings.

CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations.

ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE.

Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

The only modifications should be to remove site LP0782 from the local plan.

Additional Evidence Link:

Comment ID **APX220**

Site ref (if applicable): **LP0782**

Person ID: **1125624**

Name: **Mrs Carol McPeake**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "" "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site "" 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX223**

Site ref (if applicable): **LP0782**

Person ID: **1125544** Name: **Mr Dennis McPeake** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX224**

Site ref (if applicable): **LP0782**

Person ID: **1125544**

Name: **Mr Dennis McPeake**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect

wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX227**

Site ref (if applicable): **LP0782**

Person ID: **1124188**

Name: **Mrs Catriona Wilcox**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner'

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan.

Additional Evidence Link:

Comment ID **APX230**

Site ref (if applicable): **LP0782**

Person ID: **1122297**

Name: **Mrs Patricia Raw**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment

acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV " "To preserve the setting and special character of historic towns" "As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant.

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CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations.

ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" "Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX236**

Site ref (if applicable): **LP0782**

Person ID: **1124121**

Name: **Shooter**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX241**

Site ref (if applicable): **LP0782**

Person ID: **1128132**

Name: **Miss Janine Benner**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV " "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the

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ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" "Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" "stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally

unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX244**

Site ref (if applicable): **LP0782**

Person ID: **1128130**

Name: **Mr Ian Thewliss**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495

houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE. CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX247**

Site ref (if applicable): **LP0782**

Person ID: **1128160**

Name: **Hainsworth**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV " "To preserve the setting and special character of historic towns" "As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." "Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation (Heritage) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. Conservation (Ecology) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to

accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan.

Additional Evidence Link:

Comment ID **APX251**

Site ref (if applicable): **LP0782**

Person ID: **1130104**

Name: **Mr Wies Mielniczyn**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size.

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant.

HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc.

CONSERVATION/ECOLOGY Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide.

However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN.

ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop.

SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX253**

Site ref (if applicable): **LP0782**

Person ID: **1093148** Name: **Mr Darryl Wilcox** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "" "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site "" 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the

setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan.

Additional Evidence Link:

Comment ID **APX259**

Site ref (if applicable): **LP0782**

Person ID: **1122593**

Name: **Ms Janet Griffiths**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation (Heritage) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. Conservation (Ecology) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed.

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX265**

Site ref (if applicable): **LP0782**

Person ID: **1122060**

Name: **Mr Carl Pope**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV " "To preserve the setting and special character of historic towns" "As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." "Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation (Heritage) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. Conservation (Ecology) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" "Referring to the WYMETRO 'Journey Planner'

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX270**

Site ref (if applicable): **LP0782**

Person ID: **1175701**

Name: **Mr Ian Smith**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of

Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. 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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX273**

Site ref (if applicable): **LP0782**

Person ID: **1175701**

Name: **Mr Ian Smith**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX294**

Site ref (if applicable): **LP0782**

Person ID: **1006101**

Name: **Mr Spencer Jefferies**

Organisation: **National Grid plc**

Agent ID: **1162704**

Name: **Hannah Bevins**

Organisation: **Wood E&I Solutions UK Ltd**

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

Asset Details: 4ZZ Route 400kv two circuit route from Bradford West substation in Bradford to Padiham substation in Burnley..(see attachment) The proposed sites are crossed by a National Grid high voltage electricity transmission overhead line. National Grid prefers that buildings are not built directly beneath its overhead lines. This is for two reasons, the amenity of potential occupiers of properties in the vicinity of lines and because National Grid needs quick and easy access to carry out maintenance of its equipment to ensure that it can be returned to service and be available as part of the national transmission system. Such access can be difficult to obtain without inconveniencing and disturbing occupiers and residents, particularly where properties are in close proximity to overhead lines. National Grid seeks to encourage high quality and well planned development in the vicinity of its high voltage overhead lines. Land beneath and adjacent to the overhead line route should be used to make a positive contribution to the development of the site and can for example be used for nature conservation, open space, landscaping

areas or used as a parking court. National Grid, in association with David Lock Associates has produced 'A Sense of Place' guidelines, which look at how to create high quality development near overhead lines and offers practical solutions which can assist in avoiding the unnecessary sterilisation of land in the vicinity of high voltage overhead lines. Potential developers of the sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ. The relocation of existing high voltage overhead lines will only be considered for projects of national importance which has been identified as such by central government. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances the live electricity conductors of National Grid's overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5056601>

Comment ID **APX296**

Site ref (if applicable): **LP0782**

Person ID: **1093075**

Name: **Mrs Alison Cooper**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in

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Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" "Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" "stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How

can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? OPEN SPACE
When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX299**

Site ref (if applicable): **LP0782**

Person ID: **1093761**

Name: **Mrs Sally Dyson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. It has been deemed a sub standard highway in the past when the development of the houses on Airedale, Wharfedale and Eskdale were progressed, and through road was

not allowed for this reason, time has passed and traffic in the area is significantly worse. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." "Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife, including hare and bats but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" "Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. 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Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of

course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Additional Evidence Link:

Comment ID **APX302**

Site ref (if applicable): **LP0782**

Person ID: **1182040**

Name: **Mr. Derek armstead**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "" "Cock Hill Lane could provide a link through to the adjacent site

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX307**

Site ref (if applicable): **LP0782**

Person ID: **1094048**

Name: **Mr Paul Fallows**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns"☒As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "" "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site "" 330 dwellings. This is because of the impact on West Street and Cross Lane to the south."☒Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation (Heritage) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. Conservation (Ecology) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-

create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX311**

Site ref (if applicable): **LP0782**

Person ID: **1124632**

Name: **Ms Leila Oates**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation (Heritage) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. Conservation (Ecology) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner'

software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX319**

Site ref (if applicable): **LP0782**

Person ID: **1113733**

Name: **Mr Derek Bennett**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Greenbelt As a resident I have a good knowledge of the site and its adjacent site, LP0782. In effect both sites can be considered as one large site where some 500 houses are proposed. The two fields, as they currently, form a nature/wild life corridor separating urban Shelf from Queensbury to the north. Queensbury is rapidly building on its greenbelt land and urbanisation is spreading towards this area. Hence the vital importance to retain these fields as greenbelt and as a haven for wildlife "" bats, and owls both barn owl and tawny are to be found in the area and will use these fields for hunting at night. Should development be allowed this will be lost and further urban creep will quickly destroy the remainder of greenbelt land. The Site Assessment shows this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. Although it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also do so. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt. No such circumstances have been put forward. Such exceptional circumstances in favour of development cannot be advanced when there are dozens of small sites in our urban area that have been omitted from development. It is easier and more profitable to build on greenbelt! Paragraph 84 (NPPF) requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. As this site is distant from normal services it is therefore NOT sustainable and thus not compliant. Highways Development Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic. The only access point for LP1543 being a small farm gate onto Wade House Rd and the access to LP0782 being a small country lane "" Cock Hill Lane. Even taking into account a possible access onto South Lane which Highways DM, themselves, admit is incapable of absorbing such increased traffic they blindly deny that development of these 2 sites is unsustainable. Access through LP0782 will put increased traffic onto Cockhill Lane - a narrow country lane between dry stone walls with NO FOOTWAY for almost its entire length. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to residents' or anglers' (see fishing lakes) parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians and equestrians (3 stables on Cock Hill "" one of which is a riding school). Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a path for safety. Presumably the planners have also taken into account the limited access when it comes to development of the 2 sites and heavy contractors' vehicles?? Development of LP1543 and 0782 (either singly or jointly) should not proceed on the basis of access alone, before taking into account the many other reasons for refusing development. The cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. All traffic from Cock Hill must join main roads via limited visibility, small and unsuitable junctions; some of which have already seen serious accidents. Conservation/Ecology Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but fails to support. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. (See my previous comments under "Greenbelt" However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this

development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. Wildlife cannot accommodate development by moving to another field when their habitat is destroyed. Why try to re-create habitat elsewhere when the status quo functions perfectly well? The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This would seem to be ,ere lip service. A full species survey would be required to identify the range of flora and fauna present in this area of WHN.

Accessibility The 'Distance to Bus Stop' of between 400m and 2km may well be right but many of the RAG scores for journey times are not; most notably 'Journey time to Town Centre' which is shown as "less than 15mins" The WYMETRO 'Journey Planner' gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school. The nearest bus stop on Wade House Road is 500m distant from the school. This gives a total walking distance of 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site? Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing. Once built over this greenbelt land will be lost for this generation and for all generations to come!

Suggested Modifications:

Site needs to remain greenbelt land as it is.

Additional Evidence Link:

Comment ID **APX32**

Site ref (if applicable): **LP0782**

Person ID: **1128860**

Name: **Ms Beverley Holmes**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Firstly, my property is on the outer edge and my back garden in winter already has hardly any light due to the hill. Also the back of my property floods when snow is melting off the hill. In the field to the right at the back of my house there are Lapwings and their young nesting every year. Also there are hares in the top fields

Do you consider the plan to be Sound?: **No**

Sound Reason:

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX320**

Site ref (if applicable): **LP0782**

Person ID: **1181972**

Name: **Miss Emma Greenwood**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"“ "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school

or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." "Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" "Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" "stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the

catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX324**

Site ref (if applicable): **LP0782**

Person ID: **1092923**

Name: **Mrs Janet Armitage**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV " "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but

couldn't accommodate traffic from the whole site "" 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." "Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc.

CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings.

CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations.

ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" "Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" "stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE.

Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX326**

Site ref (if applicable): **LP0782**

Person ID: **1113729**

Name: **Miss Janet Fletcher**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

HIGHWAYS Development of LP 0782 (and LP1543 either singly or jointly) should not proceed on the basis of access alone, before taking into account the many other reasons for refusing development. The cumulative impact on the local highways is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. All traffic from Cock Hill Lane must join main roads via limited visibility, small and unsuitable junctions; some of which have already seen serious accidents. LP0782 will put increased traffic onto Cock Hill Lane - a narrow country lane between dry stone walls with NO FOOTWAY for almost its entire length. The lane is narrow with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to residents' or anglers' (see fishing lakes) parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians and equestrians (3 stables on Cock Hill "" one of which is a riding school). Pedestrians (including children, the elderly and the disabled) accessing the nearest school, doctors or public bus stop would have to use Cock Hill Lane without the benefit of a pavement separating them from the fast moving traffic. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. What the Accessibility RAG scoring has also failed to take account of is that Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cock Hill Lane as an access route to school and bus stops is utterly irresponsible, may have disastrous consequences for their safety and is ultimately UNSUSTAINABLE.

GREENBELT This site and its adjacent site, LP1543 can be considered as one large site where almost 500 houses are proposed. The two fields, as they currently stand, form a nature/wild life corridor separating urban Shelf from Queensbury to the north. Urban sprawl must be resisted. Building on greenbelt land at Queensbury is rapidly advancing towards its boundary with Shelf hence it is of the utmost importance that these fields remain as greenbelt and as a haven for the wildlife to be found there. 'Exceptional circumstances' must be demonstrated for land to be taken out of the Greenbelt. No such circumstances have been put forward. Such exceptional circumstances in favour of development cannot be advanced when there are dozens of small sites in our urban area that have been omitted from development. Brownfield sites have been overlooked and these should be used before looking towards any encroachment onto the greenbelt When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing. CONSERVATION /ECOLOGY Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but fails to support. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This would seem to be mere lip service. A full species survey would be required to identify the range of flora and fauna present in this area of WHN. Development will destroy all but a very narrow strip of the corridor The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. Wildlife cannot accommodate development by moving to another field when their habitat is destroyed. Small mitigation measures are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

The only modifications should be to remove site LP0782 from the local plan and retain it as greenbelt for the benefit of future generations.

Additional Evidence Link:

Comment ID **APX329**

Site ref (if applicable): **lp0782**

Person ID: **1120474**

Name: **Mr Neil Roddis**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX337**

Site ref (if applicable): **LP0782**

Person ID: **1106042**

Name: **Mr Neil Booth**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times,

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX34**

Site ref (if applicable): **LP0782**

Person ID: **1177837**

Name: **Mr Michael Russell**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Concern over more pressure on services such as doctors, schools, utilities etc. I already experience issues over parking around my home as I live near a school and these plans would further exacerbate these problems. Furthermore extra pressure would be placed on local roads, junctions etc. leading to streets becoming congested and or blocked.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Concern over more pressure on services such as doctors, schools, utilities etc. I already experience issues over parking around my home as I live near a school and these plans would further exacerbate these problems. Furthermore extra pressure would be placed on local roads, junctions etc. leading to streets becoming congested and or blocked.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Concern over more pressure on services such as doctors, schools, utilities etc. I already experience issues over parking around my home as I live near a school and these plans would further exacerbate these problems. Furthermore extra pressure would be placed on local roads, junctions etc. leading to streets becoming congested and or blocked.

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX346**

Site ref (if applicable): **LP0782**

Person ID: **1121674**

Name: **Mr Stephen Owrid**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound: GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan.

Additional Evidence Link:

Comment ID **APX347**

Site ref (if applicable): **LP0782**

Person ID: **1123397**

Name: **Mrs Jenny White**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

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see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan.

Additional Evidence Link:

Comment ID **APX367**

Site ref (if applicable): **LP0782**

Person ID: **1182301**

Name: **Mr Kevin Abson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "" "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site "" 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." 5 Strangely Highways DM have failed to raise similar

comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX439**

Site ref (if applicable): **LP0782**

Person ID: **1182419**

Name: **Mr Ben Armitage**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed,

or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc.

CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings.

CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations.

ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE.

Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX44**

Site ref (if applicable): **LP0782**

Person ID: **1093066** Name: **Mrs Susan Crossley** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV " "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX441**

Site ref (if applicable): **LP0782**

Person ID: **1182420**

Name: **Miss Megan Armitage**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV " "To preserve the setting and special character of historic towns" "As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south. " "Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland

but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Additional Evidence Link:

Comment ID **APX449**

Site ref (if applicable): **LP0782**

Person ID: **1024937**

Name: **Mr Ian Sanderson**

Organisation: **Principal Archaeologist
West Yorks Archaeology
Advisory Service**

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Need to add Heritage Impact Assessment on potential impact on significance of close Listed buildings, to Reports Required section, to comply with the NPPF (para. 189). This is in addition to the archaeological evaluation report identified as also being required.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

See above.

Additional Evidence Link:

Comment ID **APX450**

Site ref (if applicable): **Lp0782**

Person ID: **1181780**

Name: **Mrs Valerie Moore**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

I would like to place my objection to the amount of houses that are in for planning on site LP0782 Cock Hill Shelf. Along with the adjacent site LP 1543 at Wade House Road the total houses 496 would be a disaster got this area. The roads would not be able to cope with the amount of cars that these sites would create. The schools would be under pressure along with the doctors surgery that already runs at 5 half days a week.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX466**

Site ref (if applicable): **LP0782**

Person ID: **977588**

Name: **Ms Marta Kovacs**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. In addition to all the development that is proposed in Shelf and Northowram, there is also a massive amount of development in the surrounding Bradford District MC, which will all ultimately join into the major routes passing through Shelf and Northowram. The traffic is already a saturation point, and more development that is funnelled into this arterial route will create gridlock CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip

as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX48**

Site ref (if applicable): **LP0782**

Person ID: **715153**

Name: **Mr Brian Crossley**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

In order to make the plan sound this site must be removed from the list of proposed allocations

Additional Evidence Link:

Comment ID **APX481**

Site ref (if applicable): **LP0782**

Person ID: **1182444**

Name: **Mrs Diane Shepstone**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt land was designated as such in order to be protected from development. It is simply lazy to permanently erode the natural landscape of Calderdale by chopping up Greenbelt land rather than utilize the many other smaller non-Greenbelt sites around the district. The landscape serves to 'preserve the setting and special character' of our historic town and of Shelf - a village noted in the Domesday book of 1068. The site therefore performs strongly for all five purposes of Greenbelt land. I strongly believe there are no exceptional circumstances which could justify the permanent destruction of our green landscapes and, more importantly, of our protected land. Furthermore, there are several listed buildings in the immediate proximity and additional, large scale building and removal of existing dry stone walls will erode the local heritage. Any east/south or westbound traffic leaving the proposed site will need to travel on West Street/Shelf Hall Lane - this is an insane proposal! These tiny streets are already a nightmare slalem with parked cars and barely sufficient passing spaces. The access will be on Cock Hill Lane, where there are no footpaths because of existing dry stone walls bounding the fields. How do the developers propose that children should get to the nearest primary school? Perhaps to be driven and further congest the roads or otherwise walk? The road will be totally unsuitable for pedestrians/cyclists if the traffic volume is increased and very unsafe (on the blind bends) for walking to and from the site. The proposal to link site LP1543 with this site would compound the situation. 500 new houses cannot possibly use these unsuitable roads. The gridlock and consequent daily frustration and misery that this development would bring to existing and potentially new occupants of Shelf could be a reality if approved. As stated in their assessment of LP1543, Highways DM have stated that "Cock Hill Lane ...could not accommodate traffic for the whole site...because of the impact on West Street and Cross Lane". The plan is totally unsuitable and unsustainable - there will be NO safe access for pedestrians, including children walking to the nearest primary school, dangerous conditions for cyclists and gridlock for road users.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Large swathes of new housing is not the answer for sustainable, ecologically sound and environmentally beneficial development for Calderdale. We're surrounded by beautiful unused mill buildings, while development may require more careful thought, it could significantly enhance the existing housing stock (including small 1 and 2 bedroom houses that are especially in demand now) while not leading to Greenbelt destruction. Furthermore, where are the plans for increased bus services, school places or doctor surgeries to accommodate the approximate 20% population increase for Shelf (approx. population 4500)?

Additional Evidence Link:

Comment ID **APX506**

Site ref (if applicable): **LP0782**

Person ID: **1122023**

Name: **Miss Rachel Cubitt**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation (Heritage) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. Conservation (Ecology) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one

on this site that has existed for generations. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan and more thought given to future proposed plans

Additional Evidence Link:

Comment ID **APX53**

Site ref (if applicable): **LP0782**

Person ID: **1094032**

Name: **Mrs Sue Chadwick**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant.

HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc.

CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings.

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ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX538**

Site ref (if applicable): **LP0782**

Person ID: **1182575**

Name: **Mr Darren Hodgson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV " "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX543**

Site ref (if applicable): **LP0782**

Person ID: **1182664**

Name: **Mr Jan Zurek**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX547**

Site ref (if applicable): **LP0782**

Person ID: **1182664**

Name: **Mr Jan Zurek**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Additional Evidence Link:

Comment ID **APX552**

Site ref (if applicable): **LP0782**

Person ID: **1181763**

Name: **Mr Bryan Harkness**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Additional Evidence Link:

Comment ID **APX560**

Site ref (if applicable): **LP0782**

Person ID: **1182120**

Name: **Mrs Hayley Crawshaw**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "Cock Hill Lane could provide a link through to the adjacent site

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However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX561**

Site ref (if applicable): **LP0782**

Person ID: **1181746**

Name: **Mr Philip Cannon**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

I live a mile or so from this farmland, and at peaks times traffic heading towards Bradford will often be queued all the way back to my house and beyond. Also, the only point of access to this site is from Wade House Road, and the width of this access is incredibly narrow, as is the pavement that fronts it. Therefore, a dangerous visibility problem would exist in a particularly busy location . I am a property developer myself, and this access point/visibility issue stands out a mile. Wade House Road, which is only a short stretch of road anyway, is also just a stone's throw away from Carr House Lane and the notorious mini roundabout with Cooper Lane "" one of the worse accident black spots in the whole county. Police records will confirm this. So any more housing anywhere around here and the extra traffic this will generate will only make an already bad situation even worse "" especially a poorly considered monster proposal like this one. Proposed development LPO782, off Cock Hill Lane, is also right next to this site, which means if these developments are allowed to go ahead, they will be linked, meaning almost 500 houses on what is effectively the same plot of land! Also, Cock Hill Lane is just a narrow country lane, and in parts is single track with no pavement. It is also riddled with blind bends, and street lighting is extremely poor. This whole thing is also an ugly intrusion into our greenbelt. And it is for these reasons that I consider proposed development LP1543 (and too its partner site LP0782) to be totally unsound. Very best regards, Philip Cannon

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX566**

Site ref (if applicable): **LP0782**

Person ID: **1121289** Name: **Mr Tony Hubbert** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

There is no depth to the consideration of schools or increased traffic

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX567**

Site ref (if applicable): **LP0782**

Person ID: **1121289** Name: **Mr Tony Hubbert** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

There is no depth to the consideration of schools or increased traffic

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX574**

Site ref (if applicable): **LP0782**

Person ID: **1182765** Name: **Mr James Shepstone** Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

While I appreciate that many councils have a social responsibility to build more houses, they also have an environmental responsibility. The destruction of more greenbelt land for the building of new houses is a serious oversight and the potential effects are devastating. The location of the building is also not suitable. The road access is poor to the site and in Shelf village, the infrastructure already cannot cope with the number of road users. Adding a potential 500 new houses across the village will make the already suffering infrastructure potentially collapse, with no real alternatives available to current residents, seriously hampering their lives. There is also no provision for extra schools, doctors and dentists, where facilities are already at capacity and can't provide a service to the number of houses that already exist. GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "" "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site "" 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be

severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX577**

Site ref (if applicable): **LP0782**

Person ID: **1182781**

Name: **Mr David Robinson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "" "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site "" 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try

to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX58**

Site ref (if applicable): **LP0782**

Person ID: **1123394**

Name: **Mrs Barbara Bartle**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

This site should be removed from the Local Plan

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX580**

Site ref (if applicable): **LP0782**

Person ID: **1182781**

Name: **Mr David Robinson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns"☒As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "" "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site "" 330 dwellings. This is because of the impact on West Street and Cross Lane to the south."☒Strangely Highways DM have failed to raise similar comments against

LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc.

CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings.

CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations.

ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE.

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OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX588**

Site ref (if applicable): **LP0782**

Person ID: **1182781**

Name: **Mr David Robinson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV " "To preserve the setting and special character of historic towns" "As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south. " "Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed,

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CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations.

ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE.

Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. 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Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. 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Additional Evidence Link:

Comment ID **APX591**

Site ref (if applicable): **LP0782**

Person ID: **1182229**

Name: **Miss Jayne Booth**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT

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ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX605**

Site ref (if applicable): **Lp0782**

Person ID: **1182732**

Name: **Mr Ian Schorfield**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

This is green belt land which is the home of many species of wildlife including deer, hares, bats, foxes, birds of prey many of which are protected species . Also a right of way for many walkers.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX608**

Site ref (if applicable): **LP0782**

Person ID: **1124325**

Name: **Mrs Susan Hainsworth**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV " "To preserve the setting and special character of historic towns" "As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." "Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation (Heritage) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. Conservation (Ecology) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

The site should be removed from the local plan.

Additional Evidence Link:

Comment ID **APX612**

Site ref (if applicable): **LP0782**

Person ID: **1182858**

Name: **Mrs Christine Firth**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Additional Evidence Link:

Comment ID **APX68**

Site ref (if applicable): **LP0782**

Person ID: **1116616**

Name: **Mrs Susan Thompson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV " "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc.

CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations.

ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX683**

Site ref (if applicable): **LP0782**

Person ID: **10978**

Name: **Mr Ian Smith**

Organisation: **Historic England**

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

3 to 7 Cock Hill, opposite this site, are a Grade II Listed Building. The Heritage Impact Assessment considered that Development on the fields to the east of Cock Hill will substantially affect the setting of the listed building and important views of the building in its rural setting from Cock Hill Lane to the south.

However, it felt that the fields further to the east are less significant due to the sloping topography and are not visible in key views of the Listed Building. Historic England would concur with that analysis and with the assessment of the degree of harm that the development of this site would be likely to cause. Historic England would also endorse the mitigation measures which have been put forward in the Heritage Impact Assessment and considers that these are likely to be effective in reducing the harm to the level indicated. In order to ensure that the setting of these Listed Buildings are not harmed by the development of this area, the western half of this site should be removed from the allocation as recommended by the Heritage Impact Assessment

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Reduce the extent of Site LP0782 to exclude the area identified in the Heritage Impact Assessment as being of High Sensitivity

Additional Evidence Link:

Comment ID **APX69**

Site ref (if applicable): **LP0782**

Person ID: **1179313**

Name: **Miss Natalie Kelly**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely

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Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins"☒Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. 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residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX727**

Site ref (if applicable): **LP0782**

Person ID: **1181207**

Name: **Miss Marie A Quashie**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site

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housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX73**

Site ref (if applicable): **LP0782**

Person ID: **1121374**

Name: **Mrs Nicola Parker**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "" "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site "" 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX736**

Site ref (if applicable): **LP0782**

Person ID: **1129819**

Name: **Miss Sonia Maud**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed,

or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation (Heritage) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. Conservation (Ecology) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan.

Additional Evidence Link:

Comment ID **APX753**

Site ref (if applicable): **LP0782**

Person ID: **1118097**

Name: **Mrs Sarah Jones**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt As a resident I have a good knowledge of the site and its adjacent site, LP1543. In effect both sites can be considered as one large site where some 500 houses are proposed. The two fields, as they currently, form a nature/wild life corridor separating urban Shelf from Queensbury to the north. Queensbury is rapidly building on its greenbelt land and urbanisation is spreading towards this area. Hence the vital importance to retain these fields as greenbelt and as a haven for wildlife "" bats, and owls both barn owl and tawny are to be found in the area and will use these fields for hunting at night. Should development be allowed this will be lost and further urban creep will quickly destroy the remainder of greenbelt land. The Site Assessment shows this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. Although it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also do so. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt. No such circumstances have been put forward. Such exceptional circumstances in favour of development cannot be advanced when there are dozens of small sites in our urban area that have been omitted from development. It is easier and more profitable to build on greenbelt! Paragraph 84 (NPPF) requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. As this site is distant from normal services it is therefore NOT sustainable and thus not compliant. Highways Development Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic. The only access point for LP1543 being a small farm gate onto Wade House Rd and the access to LP0782 being a small country lane "" Cock Hill Lane. Even taking into account a possible access onto South Lane which Highways DM, themselves, admit is incapable of absorbing such increased traffic they blindly deny that development of these 2 sites is unsustainable. Access through LP0782 will put increased traffic onto Cockhill Lane - a narrow country lane between dry stone walls with NO FOOTWAY for almost its entire length. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to residents' or anglers' (see fishing lakes) parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians and equestrians (3 stables on Cock Hill "" one of which is a riding school). Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a path for safety. Presumably the planners have also taken into account the limited access when it comes to development of the 2 sites and heavy contractors' vehicles?? Development of LP1543 and 0782 (either singly or jointly) should not proceed on the basis of access alone, before taking into account the many other reasons for refusing development. The cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of

individual roads, absence of pavements, difficult junctions etc. All traffic from Cock Hill must join main roads via limited visibility, small and unsuitable junctions; some of which have already seen serious accidents. Conservation/Ecology Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but fails to support. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. (See my previous comments under "Greenbelt") However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. Wildlife cannot accommodate development by moving to another field when their habitat is destroyed. Why try to re-create habitat elsewhere when the status quo functions perfectly well? The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This would seem to be a mere lip service. A full species survey would be required to identify the range of flora and fauna present in this area of WHN.

Accessibility The 'Distance to Bus Stop' of between 400m and 2km may well be right but many of the RAG scores for journey times are not; most notably 'Journey time to Town Centre' which is shown as "less than 15mins" The WYMETRO 'Journey Planner' gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school. The nearest bus stop on Wade House Road is 500m distant from the school. This gives a total walking distance of 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site? Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop.

Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? **Open space** When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing. Once built over this greenbelt land will be lost for this generation and for all generations to come!

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Remove from local plan

Additional Evidence Link:

Comment ID **APX757**

Site ref (if applicable): **LP0782**

Person ID: **1130921**

Name: **Mrs Diane Bellerby**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my reasons as to why the plan is not sound: GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns""As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "" "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site "" 330 dwellings. This is because of the impact on West Street and Cross Lane to the south."As Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement

about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Additional Evidence Link:

Comment ID **APX759**

Site ref (if applicable): **LP0782**

Person ID: **1183336**

Name: **Mr Andrew Izzard**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site" 330 dwellings. This is because of the impact on West Street and Cross Lane to the south. Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have

a severe impact on the setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX766**

Site ref (if applicable): **LP0782**

Person ID: **1130145**

Name: **Mrs Vicki Gibson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX770**

Site ref (if applicable): **Ip0782**

Person ID: **1183380**

Name: **Mr Andrew Izzard**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant.

HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc.

CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings.

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX788**

Site ref (if applicable): **LP0782**

Person ID: **1125036**

Name: **Miss Denise Knowles**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt

boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant.

Do you consider the plan to be Sound?: **No**

Sound Reason:

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX79**

Site ref (if applicable): **LP0782**

Person ID: **975323**

Name: **Mr Charles Shaw**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "" "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site "" 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m.

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Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5046675>

Comment ID **APX795**

Site ref (if applicable): **LP0782**

Person ID: **1092926**

Name: **Miss Christine Firth**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7

Cock Hill, it also fulfils Purpose IV " "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. 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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX807**

Site ref (if applicable): **LP0782**

Person ID: **1183462**

Name: **Mrs Sarah Heslop**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX812**

Site ref (if applicable): **LP0782**

Person ID: **1106043**

Name: **Mrs Pippa Booth**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX815**

Site ref (if applicable): **LP0782**

Person ID: **1181934**

Name: **Mrs Debra Moxon**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

I think it best that this site is removed from the plan

Additional Evidence Link:

Comment ID **APX821**

Site ref (if applicable): **LP0782**

Person ID: **1117278**

Name: **Mr Bruce Whittaker**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

not thought thru..traffic,amenities,schools etc..south lane already dangerous speeding rat run...death of a village...abuse and destruction of meadow and pasture and accomp. wild life...please stop all this....

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX827**

Site ref (if applicable): **LP0782**

Person ID: **1121978**

Name: **Mrs Bridget Simpson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV " "To preserve the setting and special character of historic towns" "As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." "Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation (Heritage) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. Conservation (Ecology) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" "Referring to the WYMETRO 'Journey Planner'

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX83**

Site ref (if applicable): **Lp0782**

Person ID: **1116615**

Name: **Mrs Cathryn Zurek**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of

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Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX831**

Site ref (if applicable): **LP0782**

Person ID: **1128166**

Name: **Miss Alice Simpson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV " "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have

been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. 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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX841**

Site ref (if applicable): **LP0782**

Person ID: **1182397**

Name: **Mrs Teresa Spencer**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Conservation - This area is home to a vast amount of different species of animals. I have seen bats, owls, a whole host of different wild birds living in these fields, rabbits... to name but a few. We also have hedgehogs living on and around this area and I have photographic evidence of this. You cannot simply expect wildlife to accommodate development by moving to another place when their habitat is destroyed. Horses and cows graze on this land. There is also a right of way passage/bridle path running along and next to this site and this must be retained. Land itself - this land, in wet weather becomes water logged and extremely puggy. What's more, because this land is not flat, what will drainage be like if 500 new homes are built on the two sites and how will this affect the homes already next to the fields? This is a major FLOODING risk to those homes. Greenbelt land - Due to this land being so close to listed buildings at 3-7 Cock Hill, it actually fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. Effect on

traffic - Cockhill Lane is a steep, narrow country road with no footpaths and even now, it is difficult to navigate past parked cars. Peak hour on a morning and evening is a nightmare and with a MUCH increased flow of traffic which would result from building on this site, it would be extremely dangerous. Shelf Primary School is close to this road and at the moment it is a nightmare on a morning and afternoon with parents dropping off and picking up. It would be a very dangerous area to be walking or driving around at this time of the day especially with the proposed plan on LP1543 (Wade House Road) aswell. Traffic in and around Shelf even now is very busy - it's incredibly difficult getting onto the main road even at quieter times of the day. With extra housing, traffic would be at a standstill on a morning and afternoon. Accessibility - one access point on Cockhill Lane is not enough. This will lead to the area being incredibly dangerous. People walk on this road due to it not having any footpaths and horses are walked along this road. There are numerous accidents waiting to happen if this land is used with Cockhill Lane having an access point. Village life - How can Shelf, a small village, cope with the potential of 500 new homes? This could mean around 1000 new adults to the area and if every household had 2 children, there could be 1000 new children all needing a school place. Where would the children go to school? Primary schools and in particular, secondary schools are completely over-subscribed. The doctors's surgery in Shelf is struggling to cope even now to serve its residents! Shelf's infrastructure would not be able to cope with these added pressures. I have been informed that a high percentage of anyone living in new homes in Calderdale have to be employed within Calderdale. With 500 new homes proposed on the two sites, how can potentially up to 1000 new adults coming to live on these two sites gain employment within Calderdale? This site should be removed from the Local Plan

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX851**

Site ref (if applicable): **LP0782**

Person ID: **1183502**

Name: **mr Richard Spencer**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Conservation - This area is home to a vast amount of different species of animals. I have seen bats, owls, a whole host of different wild birds living in these fields, rabbits... to name but a few. We also have hedgehogs living on and around this area and I have photographic evidence of this. You cannot simply expect wildlife to accommodate development by moving to another place when their habitat is destroyed. Horses and cows graze on this land. There is also a right of way passage/bridle path running along and next to this site and this must be retained. Land itself - this land, in wet weather becomes water logged and

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should not be approved

Additional Evidence Link:

Comment ID **APX856**

Site ref (if applicable): **LP0782**

Person ID: **1130843**

Name: **Mr Patrick Rushgrove**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment

acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV " "To preserve the setting and special character of historic towns" "As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. 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Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX86**

Site ref (if applicable): **LP0782**

Person ID: **1092925**

Name: **Mrs Jean Maria Shaw**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX860**

Site ref (if applicable): **LP0782**

Person ID: **1129601**

Name: **Mrs Lorna Eastwood**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT

sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT
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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX871**

Site ref (if applicable): **LP0782**

Person ID: **1129074**

Name: **Mrs Z Hillam**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan.

Additional Evidence Link:

Comment ID **APX876**

Site ref (if applicable): **LP0782**

Person ID: **1130687**

Name: **Miss Kate Owram**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

This is greenspace and woodland, teeming with wildlife. It should be protected. Below is an outline of the many reasons why this site should be removed from the local plan. Some of the information provided, particularly on the assessment of this site and the LPO221 Site (Spring Head Northowram) is utterly false. Those who have provided the information on The suitability of the sites have deliberately misled and in short told damaging lies. GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan.

Additional Evidence Link:

Comment ID **APX881**

Site ref (if applicable): **LP0782**

Person ID: **1183524**

Name: **mr Steve Amos**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX891**

Site ref (if applicable): **LP0782**

Person ID: **1123556**

Name: **Mrs Beth Sky Horsfall**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that

development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation (Heritage) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. Conservation (Ecology) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX90**

Site ref (if applicable): **LP0782**

Person ID: **1129814**

Name: **Mr Robert Gordon**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

The proposed building land is Greenbelt & this is land designated by the Government as non building land that should be kept as near to its natural state as possible.

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, (I own 6/7 Cock Hill) it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns"☒As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant.

HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "" "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site "" 330 dwellings. This is because of the impact on West Street and Cross Lane to the south."☒Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site

access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. My house 6/7 Cock Hill would be severely disadvantaged & would suffer from structural problems due to heavy plant machinery & the hugely increased flow of traffic. My house was constructed between 1669 & 1700 with NO SOLID FOUNDATIONS. It is built directly onto a clay bed & therefore would suffer from any sort of nearby excavation & movement of heavy plant machinery. There are no pavements on Cock Hill, the road is narrow & steep & during the winter months Cock Hill is often closed due to snow drifts making it very dangerous. Also there are numerous dog walkers (I have three dogs) & horse riders along with walkers who use Cock Hill. These proposals would severely hamper our lifestyle. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. 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What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing. Paste.jpg

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

How can this plan have a Duty to co-operate when it will only disrupt & upset the existing local residents?

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX911**

Site ref (if applicable): **LP0782**

Person ID: **1102440**

Name: **Mrs Ann Harris**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that

development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX917**

Site ref (if applicable): **LP0782**

Person ID: **1129276**

Name: **Mr Roger Briggs**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been

assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX918**

Site ref (if applicable): **LP0782**

Person ID: **1093163**

Name: **Mr Richard Degnan**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of

existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX929**

Site ref (if applicable): **LP0782**

Person ID: **1121652**

Name: **Mrs J Feltham**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV " "To preserve the setting and special character of historic towns" "As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south. " "Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland

but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX93**

Site ref (if applicable): **LP0782**

Person ID: **1092922**

Name: **Mr David Nudds**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV " "To preserve the setting and special character of historic towns" "As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south. " "Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" "Referring to the WYMETRO 'Journey Planner'

software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX94**

Site ref (if applicable): **LP0782**

Person ID: **1092922**

Name: **Mr David Nudds**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX940**

Site ref (if applicable): **LP0782**

Person ID: **1183423**

Name: **Mr J Barrett**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

It seems that any further development in any area of Shelf and Northowram ,would be detrimental in all aspects. Taking into account the number of large family homes proposed , the number of residents will greatly increase , and carry on doing so as new occupants start/increase their families. As there is no new employment in either village, it is assumed that the new residents will have to travel to work. Because there is no railway connection in either village, the only alternative would be road transport, buses, cars or taxi. Assuming that each new house will have at least 2 cars this will lead to more traffic accidents, and congestion in an already very busy area. No High/Upper schools means that over the next few years, more school buses will be needed to transport local children out of the area to school, leading to more congestion. As supermarkets are out of the area , congested roads will again have to be used. There are no local facilities such as sports halls, swimming pools , therefore more traffic on the roads. As there is only one Doctors surgery in Shelf , road transport would again have to be used for access to a Doctor out of the area. All the above lead to unhealthy rises in traffic fumes and congestion on roads. This cannot be a good thing for our future generations. Once these plans are passed and houses are built on green belt, there is no going back.the next move would be using more green belt, as (protected green belt) seems to be no longer valid It would seem to be that the plans put forward are for financial gain i.e large houses, not for houses for small families ,or first time buyers who are supposedly not able to find housing at affordable prices. Surely there must be other land available in other parts of Halifax which will not have such a large and long imposing impact as this proposal for Shelf / Northowram.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

All sites in Shelf and Northowram should be removed and planned for areas where impacts would have lower effects on green belt and traffic congestion

Additional Evidence Link:

Comment ID **APX949**

Site ref (if applicable): **LP0782**

Person ID: **1123990**

Name: **Mrs Katherine Spivey**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the plan.

Additional Evidence Link:

Comment ID **APX95**

Site ref (if applicable): **LP0782**

Person ID: **1124482**

Name: **Mr Ben Stables**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

This site is a piece of greenbelt, being agricultural land surrounding the built up area of Shelf alongside the main road through the village. This piece of land is also very close to the listed buildings at 3-7 Cock Hill. I have done extensive research on these buildings, which is published in 'The Early History of Shelf: A West Yorkshire Village before 1700' (Published in 2018). The cottages were made from a 17th century hall and crosswing yeoman clotheirs house, which in the 19th century was altered into a row of cottages. This represents an interesting example of the change in use of buildings, underlining the social changes between the 17th and 19th centuries. This site preserves the setting of these buildings, which aligns with the fifth purpose of Greenbelt land, to "To preserve the setting and special character of historic towns". Part of this is not only the dry stone walls on the site and near the historic buildings, but also the fields surrounding it. The proposal would remove a large piece of land from the greenbelt, severely detract from the setting of historic buildings (because the land is fairly flat in the immediate vicinity a small buffer strip of land as proposed is not enough) and furthermore NPPF paragraph 83 requires that 'exceptional circumstances' should be demonstrated for land to be taken out of the Greenbelt but no such circumstances are identifiable. Cock Hill Lane is unsuitable for any larger amounts of traffic, either by vehicle or on foot. It is narrow, steep, with blind bends and the limited parking space and parked cars makes the road often become a one lane road. There is no pedestrian pavement except a short section at the end of the road where it joins West Street. This would make it very difficult for pedestrians to safely navigate Cock Hill Lane if there were to be an increase of traffic caused by more houses being built. The proposals for site access are very often unrealistic or very difficult, and I feel that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX954**

Site ref (if applicable): **LP0782**

Person ID: **368488**

Name: **Mr & Mrs E Archbold**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Highways: I contest that this development will have "No significant impact on the road network" as the local highway network in is already congested with tailbacks the length of the village at peak times. In addition, people travelling from Shelf to Halifax have to struggle through the bottle necks of Stump Cross and Godley Cutting. The roads around this site are unable to accommodate the volume of traffic from a development of this scale. Cock Hill is a narrow walled country lane, used by walkers & horse riders, and is not suitable for the extra volume of traffic that would be created by this group of developments. Also, Cock Hill has no footpath for pedestrian access. Ecology: Building on the Greenbelt near the WHN is contra to the statement in section 3.4 that the "Natural environment and biodiversity will be protected and improved." Historic Environment: Building such a large volume of housing in Shelf will change the special character and have a detrimental impact on the village setting of this area. Restoration of redundant mills in central Halifax would be a better way to provide housing whilst maintaining the cultural heritage and historic architecture of our district. Environmental Health: Building on greenfields on the outskirts of town is not sustainable development. We should be building houses nearer the jobs and rail links in order to enable a move to a low carbon economy and meet reduction in CO2 targets. Shelf is too far (and too steep a cycle!) from central locations to enable carbon free journeys from home to work. This development on the outskirts of town with no accessible rail links will lead to an increase in the volume of cars on our roads thus having a detrimental impact on greenhouse gas emissions. Rather than building so many new houses the recycling of existing buildings (e.g. empty properties and disused mills) would avoid the carbon footprint of new build. The altitude of the upper areas of Shelf is almost double the lower lying central areas of central Halifax, so the area is more prone to extreme weather & lower temperatures. Hence, new properties built in Shelf will have a negative impact on the environment as heating bills will be higher. The site assessment report has stated that "land drainage issues have been reported in the past" so this site is at risk of flooding. Shelf is a critical drainage area for Halifax; building on these fields will increase run off rates leading to surface water flooding which will lead to an increase in water in lower lying areas. This green space should be retained to assist in natural flood management. According to the vision in the plan, growing food locally will have increased by 2033 whereas the site assessment states this development will lead to a "Loss of agricultural land" The tranquility of Shelf will be compromised by this over development. This will have negative health implications due to: 1) a reduction in critical green space (which is necessary for a strong and healthy society) and 2) environmental pollution caused by an increase in traffic. Other: This site is one of a group of new housing sites in Shelf, which would massively increase the number of houses. This scale of development will drastically change the nature of our communities and local environment, and cause unsustainable pressures on roads and other social infrastructure. Instead the focus of development in Calderdale's Local Plan should be on the regeneration of brownfield sites in sustainable town centres. This amount of development is excessive, and is not in line with projected population growth detailed in the plan. In 2014, it was estimated that population growth till 2033 would be 9.1% this has now reduced to only 4% yet the householder projections included in the plan haven't been updated yet. According to table 2.5, the overall population of residents under 65 will decrease (i.e. 171,800 in 2018 & 165,900 in 2033). So why are 12,600 extra family houses required? It is critical that updated household projections are used to support this plan to ensure that vital Greenbelt land is not allocated for development when in reality (based on updated figures) these homes will no longer be required. The vast majority of the population growth is in the over 75 age group (9300 extra), however this factor does not appear to have been considered in the proposed development sites. This huge development of homes does not meet the strategic priority of responding to the ageing society. Smaller developments building more apartments and sheltered housing would seem to be more appropriate, and ideally these should be spread across the borough to enable ease of travel for families visiting elderly relatives and to enable

independent living within the local communities. To aid the health & fitness of the aging population, it would be ideal if small sport facilities were included in accommodation built for the elderly e.g. swimming pool or gym. These mixed use developments would incorporate job creation & homes for the elderly. I object to the decision to exclude land under 0.25 hectares in size from the development plan as inevitably houses are getting squeezed into every available space. Hence, the likelihood that these brownfield areas will in fact be developed should be factored into the plan. Accessibility: Section 2.33 of the plan refers to Godley Cutting & Stump Cross being congestion hot spots, building in Shelf will exacerbate this issue. According to table 2.2, 64.5% of people living in Calderdale work in Calderdale, so building on the outskirts means these people have further to travel on already congested routes. In section 5.10 (policy SD2), the plan states development should be in accessible locations & be accessible safely by different transport modes, e.g. walking. This site isn't within walking distance or safe cycling routes of sufficient employment sites to be sustainable. Hence, cars will be required so this development is not sustainable so is not compliant with national policy. How will this development support the plan to reduce car useage? Also, the topography of Shelf doesn't encourage cycle use whereas development in lower lying or more central areas would be more likely to encourage walking or cycling, which would then meet the strategic priority of increasing healthy lifestyles. Greenbelt: Building on the Greenbelt is not justified so this development doesn't meet the Test of Soundness. Before destroying the Greenbelt all possible alternatives should be fully exhausted, e.g. use of smaller Brownfield sites. According to section 6.52 of the plan "Whilst preferential to develop Brownfield sites first, the potential available land does not provide sufficient opportunities for growth in jobs" this is also applicable to this Greenbelt land. Consideration should be given to working with neighbouring local authorities, e.g. a large proportion of people living in Calderdale work in Bradford if housing development was built near the new Low Moor train station this would enable people to live nearer to work and travel sustainably. Building on the Greenbelt is not sustainable so this is not consistent with national policy. We should be living within the planets environmental limits and looking to maximise useage of existing housing stock and Brownfield sites. One of the sustainability objectives is to "Enhance viability and vitality of town centres" this is not met by the failure to develop & regenerate derelict properties & other urban land in more central areas. Consideration should be given on how we can incentivise/enforce regulations so that property owners develop their empty properties. Building on greenbelt land discourages development of the smaller central brownfield sites which are within walking distance or short bus ride of town centre locations; development of brownfield sites would encourage use of our own town centre facilities. Agricultural land is an increasingly important commodity which should be protected. The purpose of the greenbelt is to provide a safeguard to the countryside from the encroachment of over development, the greenbelt must be protected to ensure we meet the plan to protect Calderdale's environment and preserve and enhance the natural landscape. Development of this area will result in "complete loss of amenity or recreation value." This site together with adjacent sites maintains a strong, distinct gap between Shelf and the Bradford built-up area; it fulfills at least four maybe five of the purposes of Greenbelt established by NPPF: "to check the unrestricted sprawl of large built-up areas", "to prevent neighbouring towns merging into one another", "to assist in safeguarding the countryside from encroachment" and "to assist in urban regeneration, by encouraging the recycling of derelict and other urban land". Land should NOT be removed from the Greenbelt without exceptional circumstances, no such circumstances have been evidenced. Removing this land from Greenbelt is in contravention of the plans aim that the Natural environment and biodiversity of Calderdale will be protected and improved. Additional Comments: I propose that the land remain as Green Belt. Alternatively, the development should be massively reduced so that only land outside the Critical Drainage Area is developed.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

I propose that the land remain as Green Belt. Alternatively, the development should be massively reduced so that only land outside the Critical Drainage Area is developed.

Additional Evidence Link:

Comment ID **APX96**

Site ref (if applicable): **LP0782**

Person ID: **1066927**

Name: **Mrs Sally Bulgacs**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "" "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site "" 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has

either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation (Heritage) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. Conservation (Ecology) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX982**

Site ref (if applicable): **Lp0782**

Person ID: **1183625**

Name: **Mrs Julie Smith**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." "Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" "Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far

greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Calderdale has a duty of care to excising Shelf residents of all ages which this planning application will compromise . I have lived on Shelf Moor Rd for over 30 years having raised a familybut....Shelf is being pushed too far. This development would added to excising traffic problems, part-time doctor, no extra schools and facilities plus a crime rate on the increase. Until all these problems are addressed do not add more.

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5074116>

Comment ID **APX986**

Site ref (if applicable): **LP0782**

Person ID: **1183641**

Name: **Mrs Caroline Whelan**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV " "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. 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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX987**

Site ref (if applicable): **LP0782**

Person ID: **1183639**

Name: **Mr David Spivey**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose

IV"" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant.

HIGHWAYS DEVELOPMENT MANAGEMENT

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CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings.

CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations.

ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is

25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

This site should be removed from the Local Plan

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX993**

Site ref (if applicable): **LP0782**

Person ID: **1183649**

Name: **Mrs Anna Spivey**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of

development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. 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However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. 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steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX996**

Site ref (if applicable): **LP0782**

Person ID: **1183639**

Name: **Mr David Spivey**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT

Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. 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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **Lpp1079**

Site ref (if applicable): **LP0782**

Person ID: **977466**

Name: **Mr & Mrs Jean & Steven Sanderson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

See attachment

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5081691>

Comment ID **Lpp1085**

Site ref (if applicable): **LP0782**

Person ID: **1183305**

Name: **Councillor Stephen Baines**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

This Greenbelt site has constraints that should have prevented it from reaching this far in the Plan: The fact that it is near the grade 2 listed terrace 3 to 7 Cock Hill, construction of houses so near will severely limit the open views of these properties. Overhead Power Lines and supporting Pylons will reduce a large part of the site available for development. This site along with LP1543 creates a total of 505 houses adjacent to an already densely populated area in Shelf will be unacceptably overbearing in a rural area.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

To compensate for the loss of the housing requirements I would suggest the inclusion of previously rejected sites LP1034; LP1035 and LP1037. These 3 sites which are also in Greenbelt perform poorly against the 5 green Belt purposes and when assessing the revised boundary they also performs poorly. This proposal would spread the required increase in housing within the Village to a more even spread and would improve the current use and appearance of this area off Burned Road and Soaper Lane.

Additional Evidence Link:

Comment ID **Lpp1392**

Site ref (if applicable): **LP0782**

Person ID: **1183599**

Name: **Mr Andrew Wood**

Organisation: **Consultant Planner CPRE**

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

See attachment for context of comments. Introductory paragraph of Evidence Paper 2 states that: Please note that it was our intention to divide up this document and submit it in relevant sections using the representation form, but having downloaded the form we found that key entry fields were locked. Given that the representation system is in any case not well-suited to comments that develop a narrative and contain figures and tables, we have therefore reverted to submitting full documents. These are structured as carefully as possible to enable you to use them. It is our view that the Publication Draft is not positively prepared to deliver sustainable development. It is not justified by the most appropriate and up-to-date

evidence of development needs. And it will not be effective in delivering sustainable development, due to fundamental internal contradictions between the scale and distribution of development and other key policies in the Plan. This evidence paper explains our position on these points, and we conclude that very substantial modifications will be needed to make the Plan sound. Policy SD7 Housing sites: site specific housing objection LP0782 and LP1543 Cock Hill Lane and Wade House Road, Shelf Poor public transport accessibility, cumulative highways congestion impacts, heritage impacts. Results in disproportionate growth of Shelf relative to settlement hierarchy. Consequently the Green Belt release and subsequent allocation would enable an unsustainable pattern of development.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5102830><http://calderdale-consult.objective.co.uk/file/5122736>

Comment ID **Lpp215**

Site ref (if applicable): **LP0782**

Person ID: **514242**

Name: **Mrs Barbara Tempest**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Access to this site is along narrow country lanes which emerge into already congested local roads. These lanes are already hazardous since they are used as rat runs to avoid congestion on the main roads. Queuing traffic backs up in these lanes and the volume of traffic in the village is insupportable. There are no plans to provide additional doctors or school facilities and the number of houses planned for the area is unsustainable.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **Lpp505**

Site ref (if applicable): **LP0782**

Person ID: **1110001**

Name: **Councillor Peter Caffrey**

Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

This site in Cock Hill Lane Shelf has a residential capacity of 175 units. It is immediately next to site no LP1543, Wade House Road, Shelf which has a potential capacity of 330 units. Both sites are in the green belt. The collective development on the cusp of this village is therefore over 500 units in one location. This is extremely dense and overbearing in a rural area with limited infrastructure. A sounder alternative would be to remove one of these sites and replace it with sites number LP1034 and LP1035 which, although also green belt and both in Shelf, would spread the density and see development of an area which is substantially less ambient than the Cock Hill Lane site.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **Lpp52**

Site ref (if applicable): **LP0782**

Person ID: **1171108** Name: **Mr Brian Crossley (SNLPP)** Organisation: **Chairperson SNLPP**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

This comment is a duplicate of our comment made against this site under Appendix 1, Site Allocations - Supporting Information, as it is not clear which section of the Local Plan should be used. Greenbelt We accept that the site already scores as 'high sensitivity' in the Greenbelt Review 2016, scoring 4 out of the five purposes of Greenbelt, and that a positive scoring on further purposes will not change that. However, we feel we must comment on the inconsistent and entirely subjective assessment results which have concluded that the site does not fulfil Purpose IV "" 'To preserve the setting and special character of historic towns'. Our reasons for this are: - Considering Purpose IV, Q2 "" 'Would the loss of this Green Belt land adversely affect the special character of a historic place or settlement'. The site is directly opposite the GdII listed buildings at 3-7 Cockhill, separated only by the narrow Cockhill Lane, yet the assessment answers NO to this question. Considering Purpose IV, Q3 "" 'Would the loss of this Green Belt land reduce the significance of a historic place or settlement'. As stated above, the site is directly opposite the GdII

listed buildings at 3-7 Cockhill, separated only by the narrow Cockhill Lane, yet the assessment answers NO to this question. However, the assessment then concludes that development - ' Would have an effect on the setting and special character of historic features which could be mitigated against'. The answers and conclusion are quite clearly contradictory. To require mitigation there must be an effect that is being mitigated against, in this case loss of setting or significance. The need for any future, and as yet unspecified mitigation is not relevant to the questions being asked but the assessor has used subjective judgement to arrive at the answer that best supports a desired outcome. It follows then that the answers to Q2 and Q3 must be YES, and therefore the overall result must be that the site DOES fulfil Purpose IV and thereby fulfils ALL FIVE Purposes of Green Belt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. The Local Plan Technical Paper: 'Exceptional circumstances for the release of Green Belt' states that the Plan utilises the emerging National Policy in its approach to exceptional circumstances. Para. 136 of the emerging National Policy states: Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic plan-making authority should have examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of the plan, which will take into account the preceding paragraph, and whether the strategy: makes as much use as possible of suitable brownfield sites and underutilised land; It is difficult to see how there may be exceptional circumstances in favour of development when there are numerous small, underutilised sites in urban areas that have been omitted simply on the grounds of their area. A 'full examination of all reasonable options' should, by definition, have included them. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. The site is on the northern most fringe of Shelf. We refer to 'Report no 70018699-02 - Calderdale Local Plan Transport Evidence, Technical Note 1: Future Network Baseline Dated June 2016' , which shows that it is outside the 400m buffer zone of proximity to a high frequency bus service. We also refer to the Calderdale Core Transport Strategy Study "" 'Appraising the Approaches to Future Development' by Stear, Davies, Gleave dated January 2010, extracts from which are given below, of particular note are the comments contained in paras 5.8.1 and 5.8.3 We submit that, distant as it is from access to public transport and other services this site CANNOT be considered to be sustainable and therefore the proposal is non-compliant with current National Policy. Highways Development Management In their assessment of site LP1543 (Land North of Wade House road), which Highways DM are linking to this site, Highways DM have stated "" 'Cock Hill Lane could provide a link through to the adjacent site but couldn't accommodate traffic from the whole site - 330 dwellings. This is because of the impact on West Street and Cross Lane to the south.' Strangely they have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would add a further 165 houses to the 330 on LP1543. The council has not explained why the combined volume (495 houses) is not being considered for LP0782. Development of LP1543 and LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic interacting with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cockhill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. (see plates LP0782-1 to 4 attached). Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to point out that development of these sites is unsustainable. It is claimed that traffic impact for LP1543 and LP0782 (by linking) is being considered at a strategic level but Highways DM have failed to show any detail of, or seemingly to even consider, the cumulative impact of these sites on the Local Highway Network (LHN). Any proposed interventions must explain in detail the interaction between the new highway network within the sites, and its connections with the local highway

network immediately around them (and then the strategic highway network beyond). Proposals for site access are unrealistic and the cumulative impact on the local highway network has not been assessed. Judgements about the capacity of the LHN are unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. We can see some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation (Heritage) Listed Buildings at 3-7 Cockhill Lane are adjacent to the west but the Site Assessment only makes a vague reference to a 'buffer strip' along the western boundary of the site to mitigate any impact on the setting and significance of the heritage asset. Due to the topography, the width and treatment of the strip is critical but the Council has failed to give any more detail, without more detail it is impossible to make a valued comment. The Council have also failed to specify a future designation for the vaguely referenced 'buffer strip'. The policies map does not identify that it will remain in Green Belt with the supposed protection from development associated with that designation. Indeed, such a narrow strip is discouraged in NPPF and would leave it susceptible to re-designation in future plan versions. Without a robust policy to protect this strip it would be under constant pressure from developers wishing to build right up to Cock Hill Lane.

Conservation (Ecology) The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved species rich grassland but it is not defined as to how or where this may be created in the local area. The mitigation measures should be fully identified and stated BEFORE release of this site from Greenbelt as failure to define it at this stage may mean that, when a planning application is submitted, the site cannot actually be developed due to a lack of suitable mitigation sites. The site also supports a priority species listed in the Calderdale BAP (2003-2010, awaiting update). Policy GN3 "" Natural Environment states (extract): 'Development proposals which are likely to have a significant adverse impact on a site with one or more of the following designations, habitats or species will not be permitted except in exceptional circumstances where the reasons for the proposed development clearly outweigh the value of the ecological feature adversely affected and there are no appropriate alternatives: ii Local Wildlife Sites (LWS); iii Calderdale Wildlife Habitat Network (or similar designation); iv Priority habitats and species within the Calderdale Biodiversity Action Plan;' No exceptional circumstances have been put forward and there are many appropriate alternatives therefore the proposal for development is not compliant with policy GN3. The site assessment suggests that an Ornithological Survey may be required and that the 'development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network'. We would go further and suggest that a full species survey is required to identify the range of flora and fauna present in this area of semi-improved grassland. The Local Plan must also identify positively where 'locally native species rich unimproved grassland' may be provided as mitigation in the local area. Additionally, it is counter-productive that development must restore a gap in the WHN when it is the very development that is creating such a gap. Given that the site is Greenbelt and requires exceptional circumstances to justify its removal from the Greenbelt, a habitat and species assessment should be carried out BEFORE allocation. A Protected Species Report has not been called for in the site assessment but failure to take account of this at this stage may mean that, when a Planning Application is submitted, even though the site is allocated for development in the Local Plan, the presence of species in a UK or Calderdale BAP may mean that the site cannot actually be developed or the anticipated quantum of development is undeliverable.

Accessibility We agree with the 'Distance to Bus Stop' of between 400m and 2km. However, we disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as 'less than 15mins'. Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40-41mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School'

RAG scoring of 'less than 15mins' is seriously flawed. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the 'less than 15 mins' stated in the Accessibility RAG scoring. However, what the Accessibility RAG has failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic interacting with the various classes of pedestrians, most notably elderly, disabled or school children. Since journey times and distances for several other Accessibility categories involve bus journeys and walking to the bus stop then they must also now be regarded as seriously flawed. Putting aside journey times for the moment, we submit that forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety. Sustainability The Sustainability Assessment scores only 4 'positive' outcomes out of 17 with 12 outcomes being 'uncertain'. However, the Accessibility RAG scoring has been used to justify the positive outcomes on two of the objectives; SA 3 "" 'To create and retain healthy vibrant and inclusive communities' and SA5 "" 'To improve accessibility to essential services, facilities and employment'. Referring to our comments above on Accessibility, we believe that the RAG scoring is seriously flawed and thereby calls into question the 'positive' outcomes for SA3 and SA5. If only two (or at most four) of the 17 objectives are positive, we maintain that the site cannot be regarded as sustainable. Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents of this site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other parts of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the list of allocations until ALL underutilised sites (including those below 0.25ha) have been FULLY considered for allocation.

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5052366>

Comment ID **Lpp563**

Site ref (if applicable): **LP0782**

Person ID: **1183442**

Name: **Mr Daniel Cook**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" 'To preserve the setting and special character of historic towns'. As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "" 'Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site "" 330 dwellings. This is because of the impact on West Street and Cross Lane to the south.' Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc.

CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as 'between 15 and 30mins'. Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey

time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the 'less than 15 mins' stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **Lpp674**

Site ref (if applicable): **LP0782**

Person ID: **1183537**

Name: **Mr Derek Heap**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan unsound. GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose

IV"" 'To preserve the setting and special character of historic towns'. As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "" 'Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site "" 330 dwellings. This is because of the impact on West Street and Cross Lane to the south.' Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation (Heritage) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. Conservation (Ecology) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as 'between 15 and 30mins'. Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Additional Evidence Link:

Comment ID **Lpp675**

Site ref (if applicable): **LP0782**

Person ID: **1183537**

Name: **Mr Derek Heap**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan unsound. GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV" "To preserve the setting and special character of historic towns'. As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of

development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. 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the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Additional Evidence Link:

Comment ID **Lpp708**

Site ref (if applicable): **LP0782**

Person ID: **1094062**

Name: **Miss Helga Oates**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

The roads in both Shelf and Northowram already experience heavy congestion, with long delays being experienced throughout the day on the mainroads (A6036 and A644). The proposed sites are presently accessed via narrow lanes which will not support additional traffic, construction or future residential. Sites LP0782 and LP1543 are on the hill side above the existing housing, this area is colder and suffers from stronger winds than the lower lying areas of Calderdale. Properties will burn more fuel in order for inhabitants to keep warm thus increased pollution at a time when we are meant to reduce greenhouse gases.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Sites LP0782 and LP1543 should be removed from the plan

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5062203>

Comment ID **Lpp712**

Site ref (if applicable): **LP0782**

Person ID: **368488**

Name: **Mr & Mrs E Archbold**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Highways: I contest that this development will have 'No significant impact on the road network', the local highway network in is already congested with tailbacks the length of the village at peak times. In addition, people travelling from Shelf to Halifax have to struggle through the bottle necks of Stump Cross and Godley Cutting. The roads around this site are unable to accommodate the volume of traffic from a development of this scale. Cock Hill is a narrow walled country lane, used by walkers & horse riders, and is not suitable for the extra volume of traffic that would be created by this group of developments. Also, Cock Hill has no footpath for pedestrian access. Ecology: Building on the Greenbelt near the WHN is contra to the statement in section 3.4 that the 'Natural environment and biodiversity will be protected and improved.' Historic Environment: Building such a large volume of housing in Shelf will change the special character and have a detrimental impact on the village setting of this area. Restoration of redundant mills in central Halifax would be a better way to provide housing whilst maintaining the cultural heritage and historic architecture of our district. Environmental Health: Building on greenfields on the outskirts of town is not sustainable development. We should be building houses nearer the jobs and rail links in order to enable a move to a low carbon economy and meet reduction in CO2 targets. Shelf is too far (and too steep a cycle!) from central locations to enable carbon free journeys from home to work. This development on the outskirts of town with no accessible rail links will lead to an increase in the volume of cars on our roads thus having a detrimental impact on greenhouse gas emissions. Rather than building so many new houses the recycling of existing buildings (e.g. empty properties and disused mills) would avoid the carbon footprint of new build. The altitude of the upper areas of Shelf is almost double the lower lying central areas of central Halifax, so the area is more prone to extreme weather & lower temperatures. Hence, new properties built in Shelf will have a negative impact on the environment as heating bills will be higher. The site assessment report has stated that 'land drainage issues have been reported in the past' so this site is at risk of flooding. Shelf is a critical drainage area for Halifax; building on these fields will increase run off rates leading to surface water flooding which will lead to an increase in water in lower lying areas. This green space should be retained to assist in natural flood management. According to the vision in the plan, growing food locally will have increased by 2033 whereas the site assessment states this development will lead to a 'Loss of agricultural land'. The tranquility of Shelf will be compromised by this over development. This will have negative health implications due to: 1) a reduction in critical green space (which is necessary for a strong and healthy society) and 2) environmental pollution caused by an increase in traffic. Other: This site is one of a group of new housing sites in Shelf, which would massively increase the number of houses. This scale of development will drastically change the nature of our communities and local

environment, and cause unsustainable pressures on roads and other social infrastructure. Instead the focus of development in Calderdale's Local Plan should be on the regeneration of brownfield sites in sustainable town centres. This amount of development is excessive, and is not in line with projected population growth detailed in the plan. In 2014, it was estimated that population growth till 2033 would be 9.1% this has now reduced to only 4% yet the householder projections included in the plan haven't been updated yet. According to table 2.5, the overall population of residents under 65 will decrease (i.e. 171,800 in 2018 & 165,900 in 2033). So why are 12,600 extra family houses required? It is critical that updated household projections are used to support this plan to ensure that vital Greenbelt land is not allocated for development when in reality (based on updated figures) these homes will no longer be required. The vast majority of the population growth is in the over 75 age group (9300 extra), however this factor does not appear to have been considered in the proposed development sites. This huge development of homes does not meet the strategic priority of responding to the ageing society. Smaller developments building more apartments and sheltered housing would seem to be more appropriate, and ideally these should be spread across the borough to enable ease of travel for families visiting elderly relatives and to enable independent living within the local communities. To aid the health & fitness of the aging population, it would be ideal if small sport facilities were included in accommodation built for the elderly e.g. swimming pool or gym. These mixed use developments would incorporate job creation & homes for the elderly. I object to the decision to exclude land under 0.25 hectares in size from the development plan as inevitably houses are getting squeezed into every available space. Hence, the likelihood that these brownfield areas will in fact be developed should be factored into the plan. Accessibility: Section 2.33 of the plan refers to Godley Cutting & Stump Cross being congestion hot spots, building in Shelf will exacerbate this issue. According to table 2.2, 64.5% of people living in Calderdale work in Calderdale, so building on the outskirts means these people have further to travel on already congested routes. In section 5.10 (policy SD2), the plan states development should be in accessible locations & be accessible safely by different transport modes, e.g. walking. This site isn't within walking distance or safe cycling routes of sufficient employment sites to be sustainable. Hence, cars will be required so this development is not sustainable so is not compliant with national policy. How will this development support the plan to reduce car usage? Also, the topography of Shelf doesn't encourage cycle use whereas development in lower lying or more central areas would be more likely to encourage walking or cycling, which would then meet the strategic priority of increasing healthy lifestyles. Greenbelt: Building on the Greenbelt is not justified so this development doesn't meet the Test of Soundness. Before destroying the Greenbelt all possible alternatives should be fully exhausted, e.g. use of smaller Brownfield sites. According to section 6.52 of the plan 'Whilst preferential to develop Brownfield sites first, the potential available land does not provide sufficient opportunities for growth in jobs', this is also applicable to this Greenbelt land. Consideration should be given to working with neighbouring local authorities, e.g. a large proportion of people living in Calderdale work in Bradford if housing development was built near the new Low Moor train station this would enable people to live nearer to work and travel sustainably. Building on the Greenbelt is not sustainable so this is not consistent with national policy. We should be living within the planet's environmental limits and looking to maximise usage of existing housing stock and Brownfield sites. One of the sustainability objectives is to 'Enhance viability and vitality of town centres', this is not met by the failure to develop & regenerate derelict properties & other urban land in more central areas. Consideration should be given on how we can incentivise/enforce regulations so that property owners develop their empty properties. Building on greenbelt land discourages development of the smaller central brownfield sites which are within walking distance or short bus ride of town centre locations; development of brownfield sites would encourage use of our own town centre facilities. Agricultural land is an increasingly important commodity which should be protected. The purpose of the greenbelt is to provide a safeguard to the countryside from the encroachment of over development, the greenbelt must be protected to ensure we meet the plan to protect Calderdale's environment and preserve and enhance the natural landscape. Development of this area will result in 'complete loss of amenity or recreation value.' This site together with adjacent sites maintains a strong, distinct gap between Shelf and the Bradford built-up area; it fulfills at least four maybe

five of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', 'to prevent neighbouring towns merging into one another', 'to assist in safeguarding the countryside from encroachment' and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. Land should NOT be removed from the Greenbelt without exceptional circumstances, no such circumstances have been evidenced. Removing this land from Greenbelt is in contravention of the plans aim that the Natural environment and biodiversity of Calderdale will be protected and improved. Additional Comments: I propose that the land remain as Green Belt. Alternatively, the development should be massively reduced so that only land outside the Critical Drainage Area is developed.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

I propose that the land remain as Green Belt. Alternatively, the development should be massively reduced so that only land outside the Critical Drainage Area is developed

Additional Evidence Link:

Comment ID **Lpp856**

Site ref (if applicable): **LP0782**

Person ID: **10988**

Name: **Mr Anthony Rae**

Organisation: **Coordinator Calderdale Friends of the Earth**

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

In the case of this site we've noted the following comments in the detailed assessment, which reference a variety of issues about traffic/road/junction loadings, and site access. They need to be read in conjunction with the assessment for site LP1543. We've personally inspected the site and its adjacent LHN to ensure an understanding of its context, and as part of our assessment of the LHN capacity at this location: Strategic highways issues "" Highways England: - draft Policy CP1 Provision of Housing indicates a net additional requirement of 17,600 homes during the period 2015-2032. Development of this scale, combined with development of employment land, will have a significant adverse traffic impact on the operation of the SRN in West Yorkshire and at its junctions with the local primary road network. The overall impact is greater when the land use development proposals for Calderdale are assessed in combination with those of neighbouring local planning authorities. Local highways issues: - Large new site in Shelf. Could have major impact on Halifax Rd / Brighouse & Denholme Gate Road roundabout and at already congestion Hipperholme cross roads. Likely to require scheme of mitigation at Halifax Rd / Brighouse & Denholme Gate Road roundabout. - Cumulative traffic impact is being assessed by the Council using the strategic model. [FOE: not sure that this is correct because the strategic transport model does not display data covering the local highways network in Northowram and Shelf.] Summary of highways and access: - The

Highways Development Management Section has assessed that site access is achievable. However, development of the site could have a major impact at the Halifax Road/Brighouse & Denholme Road roundabout, therefore a scheme of mitigation will be required. - Despite the western field being removed from the developable area on heritage grounds, the Conservation Section consider that an access through the field would still be acceptable. This access may also be required to accommodate a proportion of the traffic from site LP1543. Please also note that the coverage of the Calderdale strategic transport model does not extend to include the local highway network affected by this site allocation, meaning that it is not possible for consultees to make a quantified assessment of its impact - see the attached screenshot.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5074075>

Main Issues and Council Response

Legal Compliance

Main Issues:

Council's Response:

Test of Soundness

Main Issues:

1. Green Belt - Loss of Green Belt. Lack of exceptional circumstances. Green Belt Assessment is incorrect. Utilise brownfield sites first.
2. Local Road Network - Inadequate local road network, specifically capacity, congestion, road safety issues, on-street parking, and lack of consideration of cumulative effects. Transport evidence does not extend to include the local highway network affected by this site.
3. Site access - Proposals for site access are unrealistic.
4. Heritage - Listed Building adjacent to the site. Suggested buffer strip is not sufficient mitigation.
5. Ecology - Impact on wildlife including BAP Priority Species, Protected Species and Local Wildlife Habitat. No detail provided on mitigation. Full assessment of impacts on the Local Wildlife Site are needed. Allocation of site will not comply with Policy GN3. A full species survey (including Protected Species Survey) should be undertaken prior to allocation.
6. Accessibility - Journey times are significantly underestimated. Distant from and unsafe access to public transport services. Topography of area around Northowram and Shelf will not encourage active travel modes.

7. Sustainability Appraisal - The results of the SA are based on flawed accessibility scores.
8. Open Space - Capacity of other open spaces.
9. Flooding - Poorly drained site. Increased risk of flooding.
10. Residential Amenity – Potential overlooking issues, impact of overshadowing.
11. Infrastructure - Lack of/pressure on existing amenities, services and facilities in the local area, e.g. schools, shops, doctors, public transport. Overhead Powerlines cross the site and should be reflected in the allocation/policy.
12. Air Quality - Impact of development on air pollution.
13. Health - Impact on health and well-being from loss of open space and increased pollution.
14. Demographics - Meeting needs arising from increase in older age groups not considered in allocation of site.
15. Site Distribution - Over allocation in a small area (particularly with LP1543) resulting in cumulative impacts and unsustainable pattern of development. Development should be located in other areas of Shelf.
16. Village Character/Setting - Negative impact on special character and setting of village.

Council's Response:

1. Document EV 09 Exceptional Circumstances for the Release of Green Belt (2018) considers the process that the Council has followed in relation to the potential need to release land from the Green Belt. It can be seen that a methodical approach has been built into each stage of the process and that ultimately this process has dovetailed with the Government's emerging policy on exceptional circumstances. The proposed changes to the Calderdale Green Belt are clearly a last resort and have been minimised. Furthermore, the boundary changes are essential to achieving a sustainable future for Calderdale – one that reconciles economic, social and environmental sustainability. With regards to the site assessment process, in order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area, only using the most sensitive Green Belt when all alternative sites were used. It is considered that the exceptional circumstances have been demonstrated to justify the proposed changes to the Calderdale Green Belt boundary.
- 2/3. The Highways Development Management Section has assessed that site access is achievable. However, development of the site could have a major impact at the Halifax Road/Brighouse & Denholme Gate Road roundabout, therefore a scheme of mitigation will be required. The requested Transport Assessment will address the impacts on the immediate area and identify any road layout changes that may be necessary. Despite the western field being removed from the developable area on heritage grounds, the Conservation Section consider that an access through the field would still be acceptable. This access may also be required to accommodate a proportion of the traffic from site LP1543.
4. In terms of heritage impacts, Cock Hill (Nos. 3-7) is situated on the western boundary of the site. A Heritage Impact Assessment has been undertaken to identify adverse impacts, and to also identify mitigation measures to make the development of the site acceptable. The assessment has recommended

that the western part of the site is removed from the allocation as development would substantially affect the setting of the listed building and important views of the building in its rural setting from Cock Hill Lane to the south. The fields further to the east are considered to be less significant due to the sloping topography and are not visible in key views of the listed building.

5. The site consists of semi-improved grassland and is bordered by the Wildlife Habitat Network. It has also been noted by the Conservation Section (Ecology) that the site is in close proximity to a Local Wildlife Site. In terms of suggested mitigation, reports of breeding lapwing would indicate that an Ornithological Survey will be required and development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network. An increased recreation impact on the nearby Local Wildlife Site will also need mitigation with any forthcoming SuDS scheme needing to take account of existing biodiversity and take the form of fen, marsh, wet grassland or standing water in basins.

6. Accessibility modelling has been undertaken by West Yorkshire Combined Authority which takes into account the most recent integrated transport networks and public transport timetables. The methodology used for assessing accessibility is within the appendices of the Site Assessment Methodology document.

7. The SA is part of the Local Plan preparation process and its purpose is to inform the development of the plan; it is not the sole contributor to proposing or rejecting site allocations. The methodology for assessing the impacts was part of the SA Framework that has been developed over a number of years. The SA Framework has been subject to a number of public consultations.

8. The site performs the function of a natural/semi-natural open space. An assessment of open space in the area shows that there are sufficient alternative natural/semi-natural areas within the 400m and 1200m catchment of this site to meet the adopted standards and that there are other Green Belt sites performing this function within the 600m catchment. Open space will however be required as part of any development proposal as there are deficiencies in other typologies. It has also been recommended that any development should consider the footpath which runs through the site.

9. Given the size of the site and its greenfield status, a Flood Risk Assessment would be required in order to assess any risk of flooding and propose mitigation measures to reduce such risks. In terms of drainage, there have been several drainage issues reported in past in the surrounding area, actions were put in place to resolve these. The Council's Flooding and Drainage Section consider the site suitable for development following a Hydrological Assessment of Wood Fall Beck and a surface water assessment. The provision of SuDS through green and blue infrastructure has been carried forward as a site specific consideration.

10. Policy BT2 - Privacy, Daylighting and Amenity Space of the Built Environment Chapter ensures that development proposals do not result in a significant adverse impact on the privacy, daylighting and private amenity space of adjacent residents or other occupants and provides adequate privacy, daylighting and private amenity space for existing and prospective residents and other occupants.

11. The Infrastructure Delivery Plan is a compendium of projected infrastructure provision and it helps to ensure that this infrastructure is provided in a timely manner and in a coordinated and sustainable way. It sets out the infrastructure that will support the level of development that is proposed in the Calderdale Local Plan.

12. Environmental Health has not raised any concerns in terms of the impact of development on air pollution levels in the area. However, the Low Emissions Strategy (2017) EV03; Air Quality Action Plan (2018) EV03 and Air Quality Technical Paper (2018) EV04, contain strategies and actions plans which are working together to help reduce and manage emissions and improve air quality.

13. Chapter 12 of the Local Plan (Health and Well Being) and guidance contained within the NPPF highlight the role of the planning system in supporting health, social and cultural wellbeing and creating healthy, inclusive communities.

Where sites contain public footpaths, schemes will be expected to incorporate this in their layout, or if ultimately necessary, arrange for a suitable diversion.

14. Policies HS3 (Housing Mix) and HS4 (Housing for Independent Living) of the Local Plan address the needs of older people within the borough. Policy HS3 of the Local Plan establishes an approach to ensure the delivery of a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community.

15. The paper to the Local Plan Working Party 17th August 2016 attached to evidence document EV09 considers the distribution of development throughout the Local Plan process. The Council considers its distribution of development to be justified and supportive of sustainable development.

16. In terms of heritage impacts, Cock Hill (Nos. 3-7) is situated on the western boundary of the site. A Heritage Impact Assessment has been undertaken to identify adverse impacts, and to also identify mitigation measures to make the development of the site acceptable. The assessment has recommended that the western part of the site is removed from the allocation as development would substantially affect the setting of the listed building and important views of the building in its rural setting from Cock Hill Lane to the south. The fields further to the east are considered to be less significant due to the sloping topography and are not visible in key views of the listed building.

Duty to Co-operate

Main Issues:

Council's Response:

Suggested Modifications

1. The site should be removed from the Local Plan.
2. A full Preliminary Ecological Appraisal and other appropriate protected species surveys should be undertaken in addition to sensitive landscape schemes to ensure no impacts to Local Wildlife Site or fragmentation of Calderdale Wildlife Habitat Network.
3. A full species survey (including Protected Species Survey) should be undertaken prior to allocation.
4. Sensitive lighting schemes and net gain in biodiversity should also be implemented.
5. Add 'Overhead Powerlines' to Constraints, and 'Consider location of overhead powerlines in the design and layout of any scheme' to Site Specific Considerations.
6. Reduce the extent of Site LP0782 to exclude the area identified in the Heritage Impact Assessment as being of High Sensitivity.
7. If the site is not removed from the Local Plan reduce it substantially so that only land outside the Critical Drainage Area is developed.

Council's Response:

1. No change required - The site's allocation is considered consistent with the Council's site allocation methodology and positioning in the trajectory as set out in the Housing Technical Paper.

2/3/4. The site consists of semi-improved grassland and is bordered by the Wildlife Habitat Network. It has also been noted by the Conservation Section (Ecology) that the site is in close proximity to a Local Wildlife Site. In terms of suggested mitigation, reports of breeding lapwing would indicate that an Ornithological Survey will be required and development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network. An increased recreation impact on the nearby Local Wildlife Site will also need mitigation and some details to be included in any forthcoming SuDS scheme have been recommended. Ecology consultees have not requested any further surveys or mitigation.

No modification required.

5. The site has been identified as having crossing overhead power lines apparatus. However, apparatus is outside the developable area due to the site being reduced on heritage grounds.

No modification required.

6. A Heritage Impact Assessment has been undertaken to identify adverse impacts, and to also identify mitigation measures to make the development of the site acceptable. The assessment has recommended that the western part of the site is removed from the allocation as development would substantially affect the setting of the listed building and important views of the building in its rural setting from Cock Hill Lane to the south.

No modification required.

7. Given the size of the site and its greenfield status, a Flood Risk Assessment would be required in order to assess any risk of flooding and propose mitigation measures to reduce such risks. In terms of drainage, there have been several drainage issues reported in past in the surrounding area, actions were put in place to resolve these. The Council's Flooding and Drainage Section consider the site suitable for development following a Hydrological Assessment of Wood Fall Beck and a surface water assessment. The provision of SuDS through green and blue infrastructure has been carried forward as a site specific consideration.

No modification required.

Representations

Comment ID **APX1035**

Site ref (if applicable): **LP1041**

Person ID: **1183808**

Name: **Mr David Dyson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment

acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE. CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX1036**

Site ref (if applicable): **LP1041**

Person ID: **1093761**

Name: **Mrs Sally Dyson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access

the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars.

CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure.

SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE.

CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX1039**

Site ref (if applicable): **LP1041**

Person ID: **1182444**

Name: **Mrs Diane Shepstone**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

TRAFFIC/ACCESS The proposal is that traffic will enter/exit via West Street - this is an insane proposal! These tiny streets are already a nightmare slalem with parked cars and barely sufficient passing spaces. In conjunction with other proposed sites LP0782, LP1543, this development could make living in this part of Shelf a total misery in terms of constant traffic and congestion. The road is so narrow and most residents must necessarily park on the street (no driveways) that a local school pickup service on West street was stopped because of existing congestion. CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE. CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Remove this site from the local plan and avoid using wildlife corridors or conservation areas

Additional Evidence Link:

Comment ID **APX104**

Site ref (if applicable): **LP1041**

Person ID: **1128154**

Name: **Mrs Cat Horsfall**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Highways Development Management Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. Conservation/Ecology The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. Sustainability The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Deliverability The site currently has several designations within the RCUDP i.e.

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX1062**

Site ref (if applicable): **LP1041**

Person ID: **228336**

Name: **Yorkshire Wildlife Trust**

Organisation: **Yorkshire Wildlife Trust**

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

PEA and protected species survey will be required to ensure woodland impacts are negligible, along with sensitive landscape schemes (including SuDs) to retain and enhance both hedgerow and woodland. This should be managed through a CEMP (Construction Environmental Management Plan) and EMP to achieve net gain for biodiversity and ensure there is no fragmentation of CWHN.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5078786>

Comment ID **APX108**

Site ref (if applicable): **LP1041**

Person ID: **1181126**

Name: **Mrs Jennifer Harkness**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Highways Development Management Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. Conservation/Ecology The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. Sustainability The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Deliverability The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX110**

Site ref (if applicable): **LP1041**

Person ID: **1094062**

Name: **Miss Helga Oates**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Highways Development Management Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent

Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars.

Conservation/Ecology The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure.

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Deliverability The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE.

Conservation/Heritage The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX121**

Site ref (if applicable): **LP1041**

Person ID: **717396**

Name: **Mrs Hoare**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Highways Development Management Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings"² However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars.

Conservation/Ecology The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure.

Sustainability The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Deliverability The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE.

Conservation/Heritage The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various

water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX125**

Site ref (if applicable): **LP1041**

Person ID: **1117675**

Name: **Mr Peter Hoare**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Highways Development Management Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. Conservation/Ecology The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the

Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. Sustainability The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Deliverability The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE. Conservation/Heritage The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX131**

Site ref (if applicable): **LP1041**

Person ID: **1171108**

Name: **Mr Brian Crossley (SNLPF)**

Organisation: **Chairperson SNLPF**

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Highways Development Management In their response to comments, Highways Development Management have said they do not agree that West Street is unsuitable and also that "traffic impact would

be minimal for this number of dwellings." From this very narrow view point, it is clear that Highways DM have failed to take account of local conditions and other development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighthouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road (because of resident's necessarily parked cars) with a 20mph speed limit, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. West Street has a footway on one side only, there being insufficient width to accommodate the second footway that would be required to allow pedestrians safe passage along it from the proposed development. For two cars to pass side by side, one car must impinge on the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (490 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane from traffic using Cockhill Lane but have failed to state these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with very restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. Highway DM assessment of the traffic impact on West Street is ill considered, contradictory to statements on nearby sites and sadly lacks any sense of reliability. To bring some clarity to this situation, Shelf & Northowram Local Plan Forum (SNLPF) have carried out our own informal traffic survey, the results of which are set out in the attached spreadsheet. The survey was carried out on 11 July 2018 between the hours of 7:30am to 9:15am. The survey consisted of a simple count of all vehicle types passing through the junction of West Street and Cockhill Lane, in any direction. The survey was split into 15min time periods to provide a graph of varying traffic volumes (see attached spreadsheet 'LP1041 Traffic Survey, West Street'). To accompany the survey results we have provided several photographs to illustrate our comments (see LP1041, Plates 1 to 5 attached). Ecology The site assessment has correctly identified an area of UK BAP priority habitat as forming part of the site and has recommended that this area be removed from the developable area, something that appears to have been acted upon. However, this should be strengthened by specifying an actual buffer distance (suggest 25m minimum) to reduce the possibility of contamination during development and to prevent the encroachment of gardens, colonisation of garden plants, dumping of garden waste and fly tipping on the BAP Priority Habitat. Such a buffer distance should apply to all development including roads and footways. The site is part of the Wildlife Habitat Network (WHN) and an important link in the wildlife corridor between Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to it being in the WHN. Development on the site will restrict the links between areas of Green Infrastructure and will therefore not be compliant with policy GN1. Development on the site will remove an important area of Green Infrastructure (GI) in Shelf and will therefore not be compliant with policy GN2. Policy GN3 "Natural Environment states (extract): "Development proposals which are likely to have a significant adverse impact on a site with one or more of the following designations, habitats or species will not be permitted except in exceptional circumstances where the reasons for the proposed development clearly outweigh the value of the ecological feature adversely affected and there are no appropriate alternatives: ii Local Wildlife Sites (LWS); iii Calderdale Wildlife Habitat Network (or similar designation); iv Priority habitats and species within the Calderdale Biodiversity Action Plan; The concept of Wildlife Habitat Networks will be used by the Council in assisting the integration of otherwise isolated areas of wildlife interest. Development will not be permitted in a Wildlife Habitat Network if it would damage the physical continuity of the Network; or impair the functioning of the Network by preventing movement of species; or harm the nature conservation value of the Network." No exceptional circumstances have been put forward and there are many appropriate alternatives therefore the proposal for development is not compliant with policy GN3. The developable area forms only part of the proposed site but the Plan does not state what designation would be applied to the remainder. That leaves the remainder susceptible to further development proposals later in the plan period. The proposed developable area is scrubland abutting a UK BAP area of

woodland and it forms an essential link in the Wildlife Corridor and WHN. Given the strong probability of the presence of a diverse set of species, a habitat and species assessment should be carried out BEFORE allocation. A Protected Species Report has not been called for in the site assessment but failure to take account of this at this stage may mean that, when a Planning Application is submitted, even though the site is allocated for development in the Local Plan, the presence of species in a UK or Calderdale BAP may mean that the site cannot actually be developed or the anticipated quantum of development is undeliverable. The Ecology assessment of site LP1041 lacks adequate definition and development would be contrary to Policies GN1, GN2 and GN3. Conservation/Heritage The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. It is the horse trough that is most likely to be affected by development as it is located at the most likely access point from the site onto West Street suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used the water from the trough will have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. In suggesting that the trough or mounting block may be moved and part of the dry-stone wall demolished, the Heritage assessment has only considered the significance of the assets but has failed to consider harm to the setting of the assets as required by NPPF para129. Sustainability Quoting the definition of Sustainability from section 5.1 of this Local Plan document: - "Whilst the most commonly used definition is known as the 'Brundtland Definition', which considers sustainable development as being "development that meets the needs of the present, without compromising the ability of future generations to meet their own needs" the principle behind the term is to ensure a better quality of life for everyone now and in the future." This allocation will: - Force increased volumes of traffic onto West Street and Cross Lane, streets that are not suitable nor can they ever be made suitable. Destroy a Wildlife Corridor Risk permanent damage to or destruction of a UK BAP Priority Habitat Destroy the setting and significance of non-designated heritage assets These things will have an impact now and their loss will impact generations to come, so we submit that this proposed site IS NOT sustainable. Deliverability The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP Priority Habitat along with the hedgerow on the northern boundary must be enhanced and retained including a buffer zone for the Priority Habitat. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the list of allocations until ALL underutilised sites (including those below 0.25ha) have been FULLY considered for allocation.

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5052371>

Comment ID **APX146**

Site ref (if applicable): **LP1041**

Person ID: **1124482**

Name: **Mr Ben Stables**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE. CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely

access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX151**

Site ref (if applicable): **LP1041**

Person ID: **1128288**

Name: **Mrs Lorraine Cornwell**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Highways Development Management Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings"² However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighthouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. Conservation/Ecology The site is made up of an area of UK BAP Priority

Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. Sustainability The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Deliverability The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE. Conservation/Heritage The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX155**

Site ref (if applicable): **LP1041**

Person ID: **1181790**

Name: **Mrs Linda Briggs**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighthouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars.

CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure.

SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE.

CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX159**

Site ref (if applicable): **LP1041**

Person ID: **1121443**

Name: **Mrs Christine Moussavi**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Highways Development Management Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. Conservation/Ecology The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. Sustainability The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my

Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Deliverability The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE. Conservation/Heritage The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX163**

Site ref (if applicable): **LP1041**

Person ID: **1116568**

Name: **Mrs Pauline Stead**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholmegate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along

it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars.

CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure.

SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore **NOT DELIVERABLE**.

CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX167**

Site ref (if applicable): **LP1041**

Person ID: **1118015**

Name: **Mr Michael Halliday**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholmegate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development

Management, and is therefore NOT DELIVERABLE. CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX174**

Site ref (if applicable): **LP1041**

Person ID: **1124475**

Name: **Mr Peter Horne**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the

site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE. CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX179**

Site ref (if applicable): **LP1041**

Person ID: **1130909**

Name: **Mr Muhammad Azhar Ullah**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Highways Development Management Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings"² However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars.

Conservation/Ecology The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure.

Sustainability The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Deliverability The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE.

Conservation/Heritage The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south

side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX184**

Site ref (if applicable): **LP1041**

Person ID: **1131102**

Name: **Mr Phil Taylor**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighthouse and Denholmegate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the

local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE. CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX188**

Site ref (if applicable): **LP1041**

Person ID: **1131193**

Name: **Mrs Susan Taylor**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider

that West Street has become an often-used cut-through for traffic from Brighthouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars.

CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure.

SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore **NOT DELIVERABLE**.

CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX190**

Site ref (if applicable): **LP1041**

Person ID: **1131193**

Name: **Mrs Susan Taylor**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighthouse and Denholmegate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of

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CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX194**

Site ref (if applicable): **LP1041**

Person ID: **1126186**

Name: **Mr Andrew Spence**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Highways Development Management Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholmegate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495

houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars.

Conservation/Ecology The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure.

Sustainability The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Deliverability The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE.

Conservation/Heritage The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX198**

Site ref (if applicable): **LP1041**

Person ID: **1181811**

Name: **Mr Simon Horsfall**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Highways Development Management Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. Conservation/Ecology The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. Sustainability The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Deliverability The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE. Conservation/Heritage The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no

longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be re3moved from the local plan

Additional Evidence Link:

Comment ID **APX201**

Site ref (if applicable): **LP1041**

Person ID: **1128288**

Name: **Mrs Lorraine Cornwell**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Highways Development Management Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholmegate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. Conservation/Ecology The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations

to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. Sustainability The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Deliverability The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE. Conservation/Heritage The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX207**

Site ref (if applicable): **LP1041**

Person ID: **1129582**

Name: **Mr Graham Shaw**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE. CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX209**

Site ref (if applicable): **LP1041**

Person ID: **1181859**

Name: **Mr Kevin Cornwell**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some

common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation/Ecology Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX215**

Site ref (if applicable): **LP1041**

Person ID: **1181903**

Name: **Mr Desmond Gee**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Highways Development Management Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings"² However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighthouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. Conservation/Ecology The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. Sustainability The Sustainability Assessment only scores 3 'positive' outcomes out of

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX225**

Site ref (if applicable): **LP1041**

Person ID: **1125544**

Name: **Mr Dennis McPeake**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford,

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CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure.

SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE.

CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX228**

Site ref (if applicable): **LP1041**

Person ID: **1124188**

Name: **Mrs Catriona Wilcox**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound

HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighthouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars.

CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure.

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DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf,

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Tis site should be removed from the local plan.

Additional Evidence Link:

Comment ID **APX237**

Site ref (if applicable): **LP1041**

Person ID: **1124121**

Name: **Shooter**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholmegate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495

houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE. CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX240**

Site ref (if applicable): **LP1041**

Person ID: **1128132**

Name: **Miss Janine Benner**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION/ECOLOGY Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so

compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX246**

Site ref (if applicable): **LP1041**

Person ID: **1128130**

Name: **Mr Ian Thewliss**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound

HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholmegate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars.

CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure.

SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE.

CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by

Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX250**

Site ref (if applicable): **LP1041**

Person ID: **1128160**

Name: **Hainsworth**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Highways Development Management Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. Conservation/Ecology The site is made up of an area of UK BAP Priority Habitat,

Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure.

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Conservation/Heritage The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan.

Additional Evidence Link:

Comment ID **APX255**

Site ref (if applicable): **LP1041**

Person ID: **1093148**

Name: **Mr Darryl Wilcox**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighthouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars.

CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure.

SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE.

CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan.

Additional Evidence Link:

Comment ID **APX260**

Site ref (if applicable): **LP1041**

Person ID: **1122593**

Name: **Ms Janet Griffiths**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Highways Development Management Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighthouse and Denholmegate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. Conservation/Ecology The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure.

Sustainability The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? **Deliverability** The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE. **Conservation/Heritage** The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX267**

Site ref (if applicable): **LP1041**

Person ID: **1122060**

Name: **Mr Carl Pope**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Highways Development Management Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford,

trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars.

Conservation/Ecology The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure.

Sustainability The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Deliverability The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE.

Conservation/Heritage The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX271**

Site ref (if applicable): **LP1041**

Person ID: **1175701**

Name: **Mr Ian Smith**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Highways Development Management Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighthouse and Denholmegate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. Conservation/Ecology The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. Sustainability The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Deliverability The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX275**

Site ref (if applicable): **LP1041**

Person ID: **1175701**

Name: **Mr Ian Smith**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Highways Development Management Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings"² However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX297**

Site ref (if applicable): **LP1041**

Person ID: **1093075**

Name: **Mrs Alison Cooper**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE. CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite

the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Remove from Local Plan

Additional Evidence Link:

Comment ID **APX301**

Site ref (if applicable): **LP1041**

Person ID: **1093761**

Name: **Mrs Sally Dyson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX304**

Site ref (if applicable): **LP1041**

Person ID: **1182040**

Name: **Mr. Derek armstead**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of

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CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure.

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DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE.

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Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX313**

Site ref (if applicable): **LP1041**

Person ID: **1124632**

Name: **Ms Leila Oates**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX322**

Site ref (if applicable): **LP1041**

Person ID: **1181972**

Name: **Miss Emma Greenwood**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholmegate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their

comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE. CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX330**

Site ref (if applicable): **lp1041**

Person ID: **1120474**

Name: **Mr Neil Roddis**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE. CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill

Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX344**

Site ref (if applicable): **LP1041**

Person ID: **1121674**

Name: **Mr Stephen Owrid**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound: **HIGHWAYS DEVELOPMENT MANAGEMENT** Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. **CONSERVATION/ECOLOGY** The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect

by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE. CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan.

Additional Evidence Link:

Comment ID **APX349**

Site ref (if applicable): **LP1041**

Person ID: **1123397**

Name: **Mrs Jenny White**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound: **HIGHWAYS DEVELOPMENT MANAGEMENT** Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighthouse and Denholmegate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. **CONSERVATION/ECOLOGY** The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. **SUSTAINABILITY** The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? **DELIVERABILITY** The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE. **CONSERVATION/HERITAGE** The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan.

Additional Evidence Link:

Comment ID **APX361**

Site ref (if applicable): **LP1041**

Person ID: **1113733**

Name: **Mr Derek Bennett**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Road Infrastructure Highways Development Management state that West Street is suitable for the increased traffic flow - "traffic impact would be minimal for this number of dwellings" Were this site the only one in the area this would undoubtedly be correct. BUT when viewed in the context of the level of housing development nearby we can see this very narrow lane on which a single car can sometimes struggle to navigate safely (residents cars park on one side as there is nowhere else for their vehicles) is patently unsuitable to take ANY extra traffic flow with any degree of safety. West Street is a narrow, single track road bordered by terrace houses on one side and a wall on the other.. It has a 20mph speed restriction, speed humps and a particularly tight bend. The former measures have been deployed because Highways recognise West St is unsuitable for any volume of traffic and what does use it needs to be slowed down. The only footpath is opposite the proposed site entrance. Pedestrians would therefore have to walk in the road to access the site. The problem is further exacerbated by traffic using West St as a rat run in order to avoid the frequent delays and queuing at Shelf roundabout, particularly at peak times. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A school pick up bus service on West Street has already been withdrawn due to congestion issues from resident's necessarily parked cars!

Conservation/Ecology The site is an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor; all of which the council claims it wants to increase and protect in the Local Plan! Development of this site will destroy or minimise all these designations to the point where they become unviable as Green Infrastructure. It would seem the Council's green policies are mere lip service and in reality are prepared to encourage developments such as this which run in direct contravention of them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on this site will destroy the link between these areas of Green Infrastructure. Sustainability The Sustainability Assessment only scores 3 'positive' outcomes out of 17! One of which is based on the seriously flawed Accessibility scores and can therefore be disregarded!

The site cannot therefore be regarded as sustainable with only 2 positive scores out of a possible 17 Deliverability The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment BUT there is very little primary employment available in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE. Conservation/Heritage The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. Just along the road (100 yards) lies the actual "Stone Chair" after which this particular hamlet is named. These artefacts, taken in conjunction, have great significance for this area. The horse trough is most likely to be compromised by the development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. The water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the Gradell listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Leave land as it is now.

Additional Evidence Link:

Comment ID **APX46**

Site ref (if applicable): **LP1041**

Person ID: **1093066**

Name: **Mrs Susan Crossley**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Road towards Shelf and Bradford,

trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars.

CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure.

SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE.

CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX469**

Site ref (if applicable): **LP1041**

Person ID: **977588**

Name: **Ms Marta Kovacs**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighthouse and Denholmegate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above

constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE.

CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX50**

Site ref (if applicable): **LP1041**

Person ID: **715153**

Name: **Mr Brian Crossley**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholmegate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent

Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE. CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site must be removed from the list of proposed allocations

Additional Evidence Link:

Comment ID **APX508**

Site ref (if applicable): **LP1041**

Person ID: **1122023**

Name: **Miss Rachel Cubitt**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Highways Development Management Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. Conservation/Ecology The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. Sustainability The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Deliverability The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE. Conservation/Heritage The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course

which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Additional Evidence Link:

Comment ID **APX540**

Site ref (if applicable): **LP1041**

Person ID: **1182575**

Name: **Mr Darren Hodgson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Highways Development Management Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighthouse and Denholmegate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. Conservation/Ecology The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point

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Conservation/Heritage The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX545**

Site ref (if applicable): **LP1041**

Person ID: **1182664**

Name: **Mr Jan Zurek**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is

suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighthouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars.

CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure.

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Additional Evidence Link:

Comment ID **APX56**

Site ref (if applicable): **LP1041**

Person ID: **1094032**

Name: **Mrs Sue Chadwick**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound

HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars.

CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure.

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DELIVERABILITY The site currently has several designations

within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE. CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX563**

Site ref (if applicable): **LP1041**

Person ID: **1130177**

Name: **Miss Sarah Butler**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the

need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT

Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." "Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc.

CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations.

ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" "Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" "stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally

unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX568**

Site ref (if applicable): **LP1041**

Person ID: **1121289**

Name: **Mr Tony Hubbert**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

There is no depth to the consideration of schools or increased traffic

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX576**

Site ref (if applicable): **lp1041**

Person ID: **1182765**

Name: **Mr James Shepstone**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighthouse and Denholmegate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE. CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an

old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX578**

Site ref (if applicable): **Lp1041**

Person ID: **1182781**

Name: **Mr David Robinson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south. " Strangely Highways DM have failed to raise similar comments against

LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc.

CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings.

CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations.

ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE.

Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX590**

Site ref (if applicable): **LP1041**

Person ID: **1113729**

Name: **Miss Janet Fletcher**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management state that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation and have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighthouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footpath. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cock Hill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cock Hill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them? The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cock Hill Clough (Greenbelt) to the northwest. Cock Hill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. SUSTAINABILITY The Sustainability

Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore **NOT DELIVERABLE**.

CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cock Hill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Remove site LP1041 from the local plan.

Additional Evidence Link:

Comment ID **APX60**

Site ref (if applicable): **LP1041**

Person ID: **1123394**

Name: **Mrs Barbara Bartle**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound **HIGHWAYS DEVELOPMENT MANAGEMENT** Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford,

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CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure.

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX610**

Site ref (if applicable): **LP1041**

Person ID: **1124325**

Name: **Mrs Susan Hainsworth**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Highways Development Management Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. Conservation/Ecology The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. Sustainability The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Deliverability The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

The site should be removed from the local plan.

Additional Evidence Link:

Comment ID **APX67**

Site ref (if applicable): **LP1041**

Person ID: **1116616**

Name: **Mrs Susan Thompson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholmegate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX71**

Site ref (if applicable): **LP1041**

Person ID: **1179313**

Name: **Miss Natalie Kelly**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound

HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars.

CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure.

SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE.

CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood

Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX738**

Site ref (if applicable): **LP1041**

Person ID: **1129819**

Name: **Miss Sonia Maud**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Highways Development Management Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighthouse and Denholmegate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. Conservation/Ecology The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these

policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. Sustainability The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Deliverability The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE. Conservation/Heritage The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan.

Additional Evidence Link:

Comment ID **APX75**

Site ref (if applicable): **LP1041**

Person ID: **1121374**

Name: **Mrs Nicola Parker**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Highways Development

Management Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars.

Conservation/Ecology The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure.

Sustainability The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Deliverability The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE.

Conservation/Heritage The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX751**

Site ref (if applicable): **LP1041**

Person ID: **1118097**

Name: **Mrs Sarah Jones**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Road Infrastructure Highways Development Management state that West Street is suitable for the increased traffic flow - "traffic impact would be minimal for this number of dwellings" Were this site the only one in the area this would undoubtedly be correct. BUT when viewed in the context of the level of housing development nearby we can see this very narrow lane on which a single car can sometimes struggle to navigate safely (residents cars park on one side as there is nowhere else for their vehicles) is patently unsuitable to take ANY extra traffic flow with any degree of safety. West Street is a narrow, single track road bordered by terrace houses on one side and a wall on the other.. It has a 20mph speed restriction, speed humps and a particularly tight bend. The former measures have been deployed because Highways recognise West St is unsuitable for any volume of traffic and what does use it needs to be slowed down. The only footpath is opposite the proposed site entrance. Pedestrians would therefore have to walk in the road to access the site. The problem is further exacerbated by traffic using West St as a rat run in order to avoid the frequent delays and queuing at Shelf roundabout, particularly at peak times. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A school pick up bus service on West Street has already been withdrawn due to congestion issues from resident's necessarily parked cars!

Conservation/Ecology The site is an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor; all of which the council claims it wants to increase and protect in the Local Plan! Development of this site will destroy or minimise all these designations to the point where they become unviable as Green Infrastructure. It would seem the Council's green policies are mere lip service and in reality are prepared to encourage developments such as this which run in direct contravention of them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on this site will destroy the link between these areas of Green Infrastructure. Sustainability The Sustainability Assessment only scores 3 'positive' outcomes out of 17! One of which is based on the seriously flawed Accessibility scores and can therefore be disregarded! The site cannot therefore be regarded as sustainable with only 2 positive scores out of a possible 17

Deliverability The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges access is not possible from the south

(A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment BUT there is very little primary employment available in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE. Conservation/Heritage The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. Just along the road (100 yards) lies the actual "Stone Chair" after which this particular hamlet is named. These artefacts, taken in conjunction, have great significance for this area. The horse trough is most likely to be compromised by the development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. The water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the Gradell listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Remove from local plan

Additional Evidence Link:

Comment ID **APX761**

Site ref (if applicable): **LP1041**

Person ID: **1183342**

Name: **Mr Robert Bottomley**

Organisation: **E Bottomley & Sons Limited**

Agent ID: **1062345**

Name: **Mr Nick Willock**

Organisation: **Robert Halstead Chartered Surveyors & Town Planners**

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **Yes**

Sound Reason:

On behalf of the sole landowner, we support the proposed housing allocation and would suggest a slight alteration to the boundary "" see below. The key planning reasons for the land being suitable for allocation are as follows: The allocation of this land will reduce the Council's reliance on Green Belt for its future housing supply. Safe access / egress would be possible from either Halifax Road or Shelf Hall Lane / West Street (or a combination of both). Development of the scale intended would not materially add to daily local traffic volumes. As the Council's Site Assessment Report points out, ecological issues are capable of being addressed and mitigated against. The site is firmly within the established urban area and would not require encroachment into surrounding countryside. The site is sustainably located close to schools,

shops, employment and medical facilities. The site is within Flood Zone 1. Other material planning matters are capable of being addressed at the planning application stage. A modification is proposed to the allocation boundary "" see attached plan and land registry document. As shown on the Land Registry document, most of the wider site is within a single ownership and we therefore consider in order to make a more efficient site boundary, a rectangular area of land should be incorporated into the proposed allocation on the western side. This would create a more efficient layout that could be more easily and effectively developed than the current proposed boundary, which would act as a constraint given its irregular and narrow form on the western side. By including this small area of additional land, it may also be possible to develop two rows of housing on this part of the site as opposed to one, thereby notably increasing the efficient development of the site and disproportionately increasing the number of houses capable of being delivered.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Proposed amendment to the boundary as detailed above and on the attached plan.

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5073560><http://calderdale-consult.objective.co.uk/file/5073561>

Comment ID **APX767**

Site ref (if applicable): **LP1041**

Person ID: **1130145**

Name: **Mrs Vicki Gibson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to

reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE. CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX806**

Site ref (if applicable): **LP1041**

Person ID: **1183462**

Name: **Mrs Sarah Heslop**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars.

CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure.

SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE.

CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite

the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX81**

Site ref (if applicable): **LP1041**

Person ID: **975323**

Name: **Mr Charles Shaw**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill

Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE. CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5046679>

Comment ID **APX817**

Site ref (if applicable): **LP1041**

Person ID: **1181934**

Name: **Mrs Debra Moxon**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of

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CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure.

SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

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CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

I strongly believe that this site should be removed from the local plan

Additional Evidence Link:

Comment ID **APX829**

Site ref (if applicable): **LP1041**

Person ID: **1121978**

Name: **Mrs Bridget Simpson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Highways Development Management Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. Conservation/Ecology The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. Sustainability The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Deliverability The site currently has several designations within the RCUDP i.e.

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX833**

Site ref (if applicable): **LP1041**

Person ID: **1128166**

Name: **Miss Alice Simpson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Highways Development Management Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access

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Conservation/Ecology The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure.

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX85**

Site ref (if applicable): **LP1041**

Person ID: **1116615**

Name: **Mrs Cathryn Zurek**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighthouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE. CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Additional Evidence Link:

Comment ID **APX858**

Site ref (if applicable): **LP1041**

Person ID: **1130843**

Name: **Mr Patrick Rushgrove**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Highways Development Management Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholmegate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the

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Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX863**

Site ref (if applicable): **LP1041**

Person ID: **1129601**

Name: **Mrs Lorna Eastwood**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE. CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX875**

Site ref (if applicable): **LP1041**

Person ID: **1129074**

Name: **Mrs Z Hillam**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound

HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighthouse and Denholmegate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars.

CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its

importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE. CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Additional Evidence Link:

Comment ID **APX88**

Site ref (if applicable): **LP1041**

Person ID: **1092925**

Name: **Mrs Jean Maria Shaw**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Additional Evidence Link:

Comment ID **APX885**

Site ref (if applicable): **LP1041**

Person ID: **1130687**

Name: **Miss Kate Owram**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

All of these areas provide a natural habitat for wildlife that the council claims to wish to protect. It is nonsensical to destroy existing habitats under the pretence of introducing alternative ones which may prove unsuccessful. Below are further comments: the information given on the suitability of this site is flawed. The assessors have made false claims and this site is not suitable for development. HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighthouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

this site should be removed from the Local Plan.

Additional Evidence Link:

Comment ID **APX886**

Site ref (if applicable): **LP1041**

Person ID: **1183524**

Name: **mr Steve Amos**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound **HIGHWAYS DEVELOPMENT MANAGEMENT** Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford,

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX919**

Site ref (if applicable): **LP1041**

Person ID: **1102440**

Name: **Mrs Ann Harris**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholmegate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX922**

Site ref (if applicable): **LP1041**

Person ID: **1093163**

Name: **Mr Richard Degnan**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholmegate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX924**

Site ref (if applicable): **LP1041**

Person ID: **1129276**

Name: **Mr Roger Briggs**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX932**

Site ref (if applicable): **LP1041**

Person ID: **1121652**

Name: **Mrs J Feltham**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's

necessarily parked cars. CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE. CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Additional Evidence Link:

Comment ID **APX941**

Site ref (if applicable): **LP1041**

Person ID: **1128586**

Name: **Mr Martin Wood**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighthouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars.

CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure.

SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE.

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan.

Additional Evidence Link:

Comment ID **APX98**

Site ref (if applicable): **LP1041**

Person ID: **1066927**

Name: **Mrs Sally Bulgacs**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Highways Development Management Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings"² However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighthouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. Conservation/Ecology The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure. Sustainability The Sustainability Assessment only scores 3 'positive' outcomes out of

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX991**

Site ref (if applicable): **LP1041**

Person ID: **1183641**

Name: **Mrs Caroline Whelan**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Highways Development Management Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighthouse and Denholmegate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because

residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars.

Conservation/Ecology The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure.

Sustainability The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

Deliverability The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE.

Conservation/Heritage The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **Lpp1077**

Site ref (if applicable): **LP1041**

Person ID: **977466** Name: **Mr & Mrs Jean & Steven Sanderson** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

See attachment

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5081691>

Comment ID **Lpp53**

Site ref (if applicable): **LP1041**

Person ID: **1171108** Name: **Mr Brian Crossley (SNLPF)** Organisation: **Chairperson SNLPF**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

This comment is a duplicate of the comment made against this site under Appendix 1, Site Allocations - Supporting Information, as it is not clear which section of the Local Plan should be used. Highways Development Management In their response to comments, Highways Development Management have said they do not agree that West Street is unsuitable and also that 'traffic impact would be minimal for this number of dwellings.' From this very narrow view point, it is clear that Highways DM have failed to take account of local conditions and other development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme Gate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road (because of resident's necessarily parked cars) with a 20mph speed limit, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. West Street has a footway on one side only, there being insufficient width to accommodate the second

footway that would be required to allow pedestrians safe passage along it from the proposed development. For two cars to pass side by side, one car must impinge on the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (490 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane from traffic using Cockhill Lane but have failed to state these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with very restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars. Highway DM assessment of the traffic impact on West Street is ill considered, contradictory to statements on nearby sites and sadly lacks any sense of reliability. To bring some clarity to this situation, Shelf & Northowram Local Plan Forum (SNLPPF) have carried out our own informal traffic survey, the results of which are set out in the attached spreadsheet. The survey was carried out on 11 July 2018 between the hours of 7:30am to 9:15am. The survey consisted of a simple count of all vehicle types passing through the junction of West Street and Cockhill Lane, in any direction. The survey was split into 15min time periods to provide a graph of varying traffic volumes (see attached spreadsheet 'LP1041 Traffic Survey, West Street'). To accompany the survey results we have provided several photographs to illustrate our comments (see LP1041, Plates 1 to 5 attached).

Ecology The site assessment has correctly identified an area of UK BAP priority habitat as forming part of the site and has recommended that this area be removed from the developable area, something that appears to have been acted upon. However, this should be strengthened by specifying an actual buffer distance (suggest 25m minimum) to reduce the possibility of contamination during development and to prevent the encroachment of gardens, colonisation of garden plants, dumping of garden waste and fly tipping on the BAP Priority Habitat. Such a buffer distance should apply to all development including roads and footways. The site is part of the Wildlife Habitat Network (WHN) and an important link in the wildlife corridor between Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to it being in the WHN. Development on the site will restrict the links between areas of Green Infrastructure and will therefore not be compliant with policy GN1. Development on the site will remove an important area of Green Infrastructure (GI) in Shelf and will therefore not be compliant with policy GN2. Policy GN3 "“ Natural Environment states (extract): 'Development proposals which are likely to have a significant adverse impact on a site with one or more of the following designations, habitats or species will not be permitted except in exceptional circumstances where the reasons for the proposed development clearly outweigh the value of the ecological feature adversely affected and there are no appropriate alternatives: ii Local Wildlife Sites (LWS); iii Calderdale Wildlife Habitat Network (or similar designation); iv Priority habitats and species within the Calderdale Biodiversity Action Plan; The concept of Wildlife Habitat Networks will be used by the Council in assisting the integration of otherwise isolated areas of wildlife interest. Development will not be permitted in a Wildlife Habitat Network if it would damage the physical continuity of the Network; or impair the functioning of the Network by preventing movement of species; or harm the nature conservation value of the Network.' No exceptional circumstances have been put forward and there are many appropriate alternatives therefore the proposal for development is not compliant with policy GN3. The developable area forms only part of the proposed site but the Plan does not state what designation would be applied to the remainder. That leaves the remainder susceptible to further development proposals later in the plan period. The proposed developable area is scrubland abutting a UK BAP area of woodland and it forms an essential link in the Wildlife Corridor and WHN. Given the strong probability of the presence of a diverse set of species, a habitat and species assessment should be carried out BEFORE allocation. A Protected Species Report has not been called for in the site assessment but failure to take account of this at this stage may mean that, when a Planning Application is submitted, even though the site is allocated for development in the Local Plan, the presence of species in a UK or Calderdale BAP may mean that the site cannot actually be developed or the anticipated quantum of development is undeliverable. The Ecology assessment of site LP1041 lacks adequate definition and development would be

contrary to Policies GN1, GN2 and GN3. Conservation/Heritage The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. It is the horse trough that is most likely to be affected by development as it is located at the most likely access point from the site onto West Street suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used the water from the trough will have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. In suggesting that the trough or mounting block may be moved and part of the dry-stone wall demolished, the Heritage assessment has only considered the significance of the assets but has failed to consider harm to the setting of the assets as required by NPPF para129. Sustainability Quoting the definition of Sustainability from section 5.1 of this Local Plan document: - 'Whilst the most commonly used definition is known as the 'Brundtland Definition', which considers sustainable development as being "development that meets the needs of the present, without compromising the ability of future generations to meet their own needs"the principle behind the term is to ensure a better quality of life for everyone now and in the future.' This allocation will: - Force increased volumes of traffic onto West Street and Cross Lane, streets that are not suitable nor can they ever be made suitable. Destroy a Wildlife Corridor Risk permanent damage to or destruction of a UK BAP Priority Habitat Destroy the setting and significance of non-designated heritage assets These things will have an impact now and their loss will impact generations to come, so we submit that this proposed site IS NOT sustainable. Deliverability The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP Priority Habitat along with the hedgerow on the northern boundary must be enhanced and retained including a buffer zone for the Priority Habitat. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the list of allocations until ALL underutilised sites (including those below 0.25ha) have been FULLY considered for allocation.

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5052367>

Comment ID **Lpp565**

Site ref (if applicable): **LP1041**

Person ID: **1183442**

Name: **Mr Daniel Cook**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound

HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - 'traffic impact would be minimal for this number of dwellings'. However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholmegate Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars.

CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure.

SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore NOT DELIVERABLE.

CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Main Issues and Council Response

Legal Compliance

Main Issues:

Council's Response:

Test of Soundness

Main Issues:

1. Local Highway Network - Inadequate local road network, specifically capacity, congestion, road safety issues, on-street parking and lack of consideration of cumulative effects.
2. Ecology - Impact on wildlife including UK BAP Priority Habitat and Local Wildlife Site. Preliminary Ecological Appraisal and Protected Species Survey required as well as a Construction Environmental Management Plan and an Ecological Management Plan. Development would not comply with Green Infrastructure policies in the Plan. A Protected Species Survey should be undertaken prior to allocation.
3. Sustainability Appraisal - The results of the SA are based on flawed accessibility scores. Development would not be in line with the definition of Sustainable Development.
4. Deliverability - Site not deliverable due to required highway and ecological mitigation measures constraining access.
5. Heritage - Impact on heritage assets, including horse trough located at most likely access point. Impact on setting has not been considered.
6. Infrastructure - Lack of/pressure on existing amenities, services and facilities in the local area, e.g. schools, shops, doctors.
7. Flooding - Building on greenfield sites will increase surface water flooding.

Council's Response:

1. In terms of highway impact, the Highways Development Management Section consider that the site could be accessed off West Street on the western boundary of the site. Further, if this access were to be opposite Cock Hill Lane it may be possible to form a roundabout junction of the site access, Cock Hill Lane and West Street. The traffic impact is deemed to be minimal for a development of this scale.

2. In accordance with advice from West Yorkshire Ecology, the Lowland Mixed Deciduous Woodland (UK BAP priority habitat) has been removed from the developable area. In addition, the existing hedgerow on the northern boundary of the site should be retained and enhanced with additional planting of native shrubs. Such mitigation measures will be carried forward as site specific considerations. It has also been noted that the Sun Wood/North Wood Local Wildlife Site is situated to the east of the site.

3. The SA is part of the Local Plan preparation process and its purpose is to inform the development of the plan; it is not the sole contributor to proposing or rejecting site allocations. The methodology for assessing the impacts was part of the SA Framework that has been developed over a number of years. The SA Framework has been subject to a number of public consultations.

4. The site is considered to be deliverable as it is in single ownership and has been confirmed as being available. Whilst there are highway and ecological constraints, these are not considered to render the site undevelopable.

5. With regard to heritage considerations the wider site is bounded to its western edge by a stone boundary wall which incorporates a stone drinking trough and other stone features. These stone features could be considered to be non-designated heritage assets. If access is to be taken from West Street these features should be retained if at all possible, or potentially relocated to elsewhere along the wall. Thus, it is considered that whilst the development of this site is unlikely to result in harm to any designated heritage asset, there could be a detrimental impact on non-designated heritage assets forming part of the western boundary wall.

6. The Infrastructure Delivery Plan is a compendium of projected infrastructure provision and it helps to ensure that this infrastructure is provided in a timely manner and in a coordinated and sustainable way. It sets out the infrastructure that will support the level of development that is proposed in the Calderdale Local Plan.

7. The site is considered developable in terms of flood risk as the site is within Flood Zone 1 and it is suggested that any development be permitted subject to consultation with the Local Planning Authority. The Council's Flooding and Drainage Section has suggested that SuDS should be provided through green and blue Infrastructure. As the Sun Wood Clough watercourse has been removed from the developable area, a Flood Risk Assessment is not required.

Duty to Co-operate

Main Issues:

Council's Response:

Suggested Modifications

1. The site should be removed from the Local Plan.
2. Site Specific Consideration regarding ecology should specify a buffer from the UK BAP Priority Habitat.
3. A full Preliminary Ecological Appraisal and other appropriate protected species surveys should be undertaken in addition to sensitive landscape schemes to ensure no impacts to Local Wildlife Site or fragmentation of Calderdale Wildlife Habitat Network.

4. Sensitive lighting schemes and net gain in biodiversity should also be implemented.
5. Full assessment of impacts to Local Wildlife Site needed along with appropriate mitigation.
6. Extend the boundary to include land under same ownership.

Council's Response:

1. No change required - The site's allocation is considered consistent with the Council's site allocation methodology and positioning in the trajectory as set out in the Housing Technical Paper.

2/3/4/5. In accordance with advice from West Yorkshire Ecology, the Lowland Mixed Deciduous Woodland (UK BAP priority habitat) has been removed from the developable area. In addition, the existing hedgerow on the northern boundary of the site should be retained and enhanced with additional planting of native shrubs. Such mitigation measures will be carried forward as site specific considerations. The aforementioned consultee has not made recommendations regarding buffers, protected species surveys or sensitive lighting schemes.

No modification required.

6. The site area and site boundary are considered to be appropriate based on the constraints of the site and the recommendations from our consultees.

No modification required.

Document Section: LP1543 - New Housing Site - Northowram and Shelf

Representations

Comment ID **APX101**

Site ref (if applicable): **LP1543**

Person ID: **1180033** Name: **Mrs. Tessa Drury** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Green belt land that should not be built on. Infrastructure not suitable for large number of houses, especially the roads

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX102**

Site ref (if applicable): **LP1543**

Person ID: **1128154** Name: **Mrs Cat Horsfall** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not

be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation/Ecology Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to recreate (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I

suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX1033**

Site ref (if applicable): **LP1543**

Person ID: **1183808**

Name: **Mr David Dyson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the

five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. 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It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. 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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Additional Evidence Link:

Comment ID **APX1037**

Site ref (if applicable): **LP1543**

Person ID: **1182859**

Name: **Mr Ian Penton**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. 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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX1038**

Site ref (if applicable): **LP1543**

Person ID: **1182444**

Name: **Mrs Diane Shepstone**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt land was designated as such in order to be protected from development. It is simply lazy to permanently erode the natural landscape of Calderdale by chopping up Greenbelt land rather than utilize the many other smaller non-Greenbelt sites around the district. The landscape serves to 'preserve the setting and special character' of our historic town and of Shelf - a village noted in the Domesday book of 1068. The site therefore performs strongly for all five purposes of Greenbelt land. I strongly believe there are no exceptional circumstances which could justify the permanent destruction of our green landscapes and, more importantly, of our protected land. Furthermore, there are several listed buildings in the immediate proximity and additional, large scale building and removal of existing dry stone walls will erode the local heritage. Any east/south or westbound traffic leaving the proposed site via proposed site LP0782 will need to travel on West Street/Shelf Hall Lane - this is an insane proposal! These tiny streets are already a nightmare slalem with parked cars and barely sufficient passing spaces. The access will be on Cock Hill Lane, where there are no footpaths because of existing dry stone walls bounding the fields. How do the developers propose that children should get to the nearest primary school? Perhaps to be driven and further congest the roads or otherwise walk? The road will be totally unsuitable for pedestrians/cyclists if the traffic volume is increased and very unsafe (on the blind bends) for walking to and from the site. The proposal to link site LP0782 with this site would compound the situation. 500 new houses cannot possibly use these unsuitable roads. The gridlock and consequent daily frustration and misery that this development would bring to existing and potentially new occupants of Shelf could be a reality if approved. As stated in their assessment, Highways DM have stated that "Cock Hill Lane ...could not accommodate traffic for the whole site...because of the impact on West Street and Cross Lane". The plan is totally unsuitable and unsustainable - there will be NO safe access for pedestrians, including children walking to the nearest primary school, dangerous conditions for cyclists and gridlock for road users. Furthermore, it would be far from realistic to have the only workable site entry for 500 new homes (500+ cars?) onto Halifax Road, the opening is narrow and traffic at peak times is usually already stacked along this main road between Northowram village and Buttershaw.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Large swathes of new housing is not the answer for sustainable, ecologically sound and environmentally beneficial development for Calderdale. We're surrounded by beautiful unused mill buildings, while development may require more careful thought, it could significantly enhance the existing housing stock (including small 1 and 2 bedroom houses that are especially in demand now) while not leading to Greenbelt destruction. Furthermore, where are the plans for increased bus services, school places or doctor surgeries to accommodate the approximate 20% population increase for Shelf (approx. population 4500)?

Additional Evidence Link:

Comment ID **APX1044**

Site ref (if applicable): **LP1543**

Person ID: **1092926**

Name: **Miss Christine Firth**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation/Ecology Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an

effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Additional Evidence Link:

Comment ID **APX1063**

Site ref (if applicable): **LP1543**

Person ID: **228336**

Name: **Yorkshire Wildlife Trust**

Organisation: **Yorkshire Wildlife Trust**

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

We are encouraged to see requests for species specific surveys, however would also like to see full PEA and other appropriate protected species surveys; in addition to sensitive landscape schemes (including SuDs) to ensure no impacts to LWS or fragmentation of CWHN. Sensitive lighting schemes and net gain in biodiversity should also be implemented. Full assessment of impacts to LWS will be needed along with appropriate mitigation.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5078786>

Comment ID **APX107**

Site ref (if applicable): **LP1543**

Person ID: **1181126**

Name: **Mrs Jennifer Harkness**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX1087**

Site ref (if applicable): **LP1543**

Person ID: **1184615**

Name: **Mr David Pickard**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

We believe this site should NOT be removed from the Greenbelt and we believe the plans to build on this site should be withdrawn. Below are our concerns/views as to why we consider this local plan is unsound and not sustainable (indeed 12 out of the 16 objectives in the sustainability report appraisal linked to this site are UNCERTAIN):- Listed Buildings There are listed buildings in the very close vicinity to this site (3-7 Cockhill Lane). We need to value their existence which is integral to the history of Shelf village and to protect their longevity. Risk of flooding Given the raised height and steep gradient of this land there would be high 'run off' rates for flooding "" with impacts for existing properties and the main village highway which are all below this site. As residents of Parkstone Rise a particular concern would be to possible damage to the footings of homes like ours which are on the edge of this site. Even in its' current use as grazing pastures this land easily becomes completely water logged (clay soil and former mining land in some parts) The current natural drainage system has proven that with our change in climate bringing wetter periods of weather than ever before to add a significant number of new homes onto this land

would mean there would be knock on effects for residents living below this land. There would also need to be major financial investment to renew old drainage systems. Increase in traffic volumes Such a large new build estate/or estates would significantly increase traffic volumes in an area which is already struggling to cope. Rather than reduce green house gas emissions it would actually increase them enormously. We already have a growing concern over the increase of motor vehicles stop/starting within the village and it is well documented that there is a link between particulates in vehicle emissions and Asthma "" to increase the traffic volumes - slow the traffic to stop start even further would make this a major issue for pedestrians "" particularly the young "" travelling to and from school, the elderly and vulnerable individuals. There is already a concern amongst residents like ourselves that it is getting to a 'grid lock' stage on the country lanes and access points to homes "" e.g.it is very hard to access homes from Broad Ings way and Shelf Hall Road etc at school run times (and travel to work times) due to the high number of large motor vehicles which park on the narrow roads making access for singular traffic only "" often coming to an impasse. To introduce significantly more local traffic to this area would exasperate the situation to a grid lock. To build huge estates of over 500 homes (even 330 odd on one site) would certainly have an immediate negative impact on residents health and wellbeing. In general 24 years ago on a 'new build estate' residents would have a maximum of 2 vehicles per household -now on modern estates aimed at families and young people this has increased to one per driver per household where residents are aged over 17years. (so in many cases as 'the norm' there are 4 residents with 4 cars or two residents with three cars or 1 resident with 2 cars) "" this trend is going to increase not decline. Do we really want to be responsible for causing grid lock and toxic fumes on our village roads for future generations? Biodiversity and geodiversity Part of this site lies within a wildlife habitat network (and is surrounded by livery stables) so we have genuine concerns about the negative impacts any build would have on the biodiversity and geodiversity. The Landscape Any buildings on this land would completely devastate the landscape "" given its' position it can be viewed from an extensive panorama. This land is excellent grazing land and in our view should remain as such. The Calderdale way runs through this land "" the well worn paths show how much it is used (e.g by ramblers/runners/dog walkers/residents etc.). Connecting with nature is promoted by Calderdale Council and the NHS as a way of reducing stress, improving mental health and improving overall wellbeing. The impacts of building on this site would do the opposite as it would remove almost all of the green open space the village of Shelf has. The start of the Calderdale way from this position would be a built up site. Highways Aside from our belief that the proposed access to this development is totally unsustainable the impacts of so many more hundreds of vehicles would be highly negative on all the adjoining highways and junction points. (e.g. in the immediate vicinity and with a ripple effect such as Cockhill lane, Shelf hall lane, Shelf and Wibsey roundabouts, Odsal top, Stump Cross, Lightcliffe traffic lights and Queensbury etc Future projections of 20 years after such a build would be 'grid lock' "" with no spare land to sort out the road issues. Housing Services Whilst we fully appreciate the need for more affordable housing is a national issue "" Shelf as a small village is already surrounded by large social housing developments e.g. Belle Vue, Buttershaw, Queensbury and Woodside . Residents from all these areas use and value the greenbelt space which Shelf currently has "" take this away and Shelf becomes just a big housing development "" not a 'rural' village. Ecology Hedgehogs are an endangered species and their populations are in steep decline . When the existing 'new' homes adjoining the proposed site were built approx. 24 years ago the negative impact on wildlife was significant (hedgehogs/foxes/badgers/birds/deer/field mice/harvest mice/shrews etc) so much so that it took more than 15 years for the Hedgehog population to come back to the area "" and some species have not returned. For the last 6 years plus we have been feeding Hedgehogs every day (except during hibernation) and so have been very mindful of how even small changes to the environment can have a massive impact on their numbers. (e.g.paving over lawns/erecting fencing/removing hedges etc) The increase in traffic and brighter new street lighting along with less green spaces have already resulted in more recent Hedgehog deaths around Cockhill Lane, Shelf Hall Lane and Broad Ings Way. To build such a huge number of new homes on this greenbelt site would in our opinion seal their fate! We need the Greenbelt, hedgerows, wild plants, grassland and bogs to remain. The BAT population is also not as active as it was 24

years ago when the last massive change to the local environment took place. However, we are still lucky enough to see bats in Parkstone Rise and over the greenbelt fields. If this land were to be built on we would knowingly be taking away the natural habitat of a Protected species. In this generation of new technologies we need our green spaces more than ever to ensure the health and wellbeing of the residents of Shelf and other local villages. Once they are gone they are gone "" it is our Responsibility to ensure this does not happen. Thank you for taking our views into consideration.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5101477>

Comment ID **APX113**

Site ref (if applicable): **LP1543**

Person ID: **1181302**

Name: **Miss Kathryn Mann**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX117**

Site ref (if applicable): **LP1543**

Person ID: **1094062**

Name: **Miss Helga Oates**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the

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There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation/Ecology Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of

17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX120**

Site ref (if applicable): **LP1543**

Person ID: **717396**

Name: **Mrs Hoare**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further

traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. 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Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. 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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX1205**

Site ref (if applicable): **LP1543**

Person ID: **1182573**

Name: **Ms Sheila Tatham**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

331 houses planned. this is potentially at least 331 cars trying to get onto Wade house road. This s already a very busy road and the proposed access has poor visibility. This is green belt land and would destroy large chunk of remaining wild life corridor. the foot paths would have to be protected. On rainy days water runs down wade house avenue - both the road between the houses and the access land at the back of the houses to the left. This has been very bad in periods of wet weather. I have great concern that further flooding will be created on this sloping land when construction begins.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

The response to concerns about flooding state that flooding issues can be mitigated. the nearest house to wade house avenue - part of Broad Ings way (another development) has sand bags around it. I assume the site of Broad Ings way was also 'mitigated' to prevent flooding - but this obviously didn't work for a section of these houses! I believe that the area above and to the left as you walk up wade house avenue should be

left clear to prevent further flooding. The issue of further flooding of wade house avenue is very worrying - we are at the bottom of a very large sloping development. It doesn't take a genius to work out who would end up with all the water running down!

Additional Evidence Link:

Comment ID **APX124**

Site ref (if applicable): **LP1543**

Person ID: **1117675**

Name: **Mr Peter Hoare**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782

(either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation/Ecology Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX132**

Site ref (if applicable): **LP1543**

Person ID: **1171108**

Name: **Mr Brian Crossley (SNLPPF)**

Organisation: **Chairperson SNLPPF**

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt We accept that the site already scores as 'high sensitivity' in the Greenbelt Review 2016, scoring 3 out of the five purposes of Greenbelt, and that a positive scoring on further purposes will not change that. However, we feel we must comment on the inconsistent and entirely subjective assessment results which have concluded that the site does not fulfil Purpose I " "To check the unrestricted sprawl of large built up areas" Considering Purpose I, Q3 - "Is there a robust permanent Greenbelt/Development boundary?" A comparison with the adjacent site LP0782 shows that it shares a boundary, has identical boundary treatments and has been correctly given a YES in answer to this question. It is inconsistent and illogical to answer NO for LP1543. Considering Purpose I, Q7 - " Would development of the site create an irregular settlement pattern?" Development of the site would leave a narrow strip of Greenbelt/Open Space on the Eastern edge only meters wide in places. The northern and western edges are bounded by farmland so the site would only be connected to Shelf on the southern boundary thereby creating a bulge in the settlement boundary of Shelf. The only consistent and logical answer to Q7 must therefore be YES. With positive answers to Q3 and Q7 the only possible conclusion therefore is that the site fulfils Purpose I. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. The Local Plan Technical Paper: "Exceptional circumstances for the release of Green Belt" states that the Plan utilises the emerging National Policy in its approach to exceptional circumstances. Para. 136 of the emerging National Policy states: Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic plan-making authority should have examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of the plan, which will take into account the preceding paragraph, and whether the strategy: makes as much use as possible of suitable brownfield sites and underutilised land; It is difficult to see how there may be exceptional circumstances in favour of development when there are numerous small, underutilised sites in urban areas that have been omitted simply on the grounds of their area. A 'full examination of all reasonable options' should, by definition, have included them. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. The site is on the northern most fringe of Shelf. We refer to' Report no 70018699-02 - Calderdale Local Plan Transport Evidence, Technical Note 1: Future Network

Baseline Dated June 2016', which shows that it is outside the 400m buffer zone of proximity to a high frequency bus service. We also refer to the Calderdale Core Transport Strategy Study "" "Appraising the Approaches to Future Development" by Stear, Davies, Gleave dated January 2010, extracts from which are given below, of particular note are the comments contained in paras 5.8.1 and 5.8.3 We submit that, distant as it is from access to public transport and other services this site CANNOT be considered to be sustainable and therefore the proposal is non-compliant with current National Policy. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide, as shown on our attached photo (see plate LP1543-1 attached). Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses, notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume (see also assessment and comments for LP0782). Linking LP1543 and LP0782 has the potential for 495 houses but Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to point out that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic interacting with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cockhill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. It is claimed that traffic impact for LP1543 and LP0782 (by linking) is being considered at a strategic level but Highways DM have failed to show any detail of, or seemingly to even consider, the cumulative impact of these sites on the Local Highway Network (LHN). Any proposed interventions must explain in detail the interaction between the new highway network within the sites, and its connections with the local highway network immediately around them (and then the strategic highway network beyond). Proposals for site access are unrealistic and the cumulative impact on the local highway network has not been assessed. Judgements about the capacity of the LHN are unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. We can see some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made, it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation/Ecology Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Sun Wood/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. In our opinion, the remaining strip of WHN would be so compromised by recreational disturbance from this development that it would cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show

any results of such an assessment. Policy GN1 - Securing green infrastructure provision states (extract): "The Council will put mechanisms in place to secure Green Infrastructure provision in the Borough. To achieve this, the primary focus will be on: Improving and enhancing existing Green Infrastructure assets, and/or expanding existing, or creating new, Green Infrastructure assets; Encouraging the protection, enhancement and creation of Green Infrastructure through the Development Management System; New development must be served by Green Infrastructure to meet the needs of the prospective residents in a manner which will contribute to the creation of a high-quality environment and provide access to high quality open space for leisure and recreational purposes. Development proposals should ensure that: The Green Infrastructure function of the land is retained and where possible improved; The opportunity is taken to extend and increase Green Infrastructure by linking green spaces, filling in gaps in Green Infrastructure provision, and/or increasing Species and Habitats of Principal Importance." The proposal for development on LP1543 is not compliant with policy GN1.

Policy GN2 - A joined up green infrastructure network states (extract): "The Council will ensure that the Green Infrastructure network is joined up. Existing spaces should be interlinked allowing biodiversity and humans safe access to, and transit between, a range of valued spaces. To achieve this, decisions upon development proposals shall have particular regard to: Maintaining critical biodiversity assets and providing long term security for these as identified in the Calderdale Biodiversity Action Plan; The proposal for development on LP1543 is not compliant with policy GN2. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved species rich grassland but it is not defined how or where this may be created in the local area. The mitigation measures should be fully identified and stated BEFORE release of this site from Greenbelt as failure to define it at this stage may mean that, when a planning application is submitted, the site cannot actually be developed due to a lack of suitable mitigation sites.

Policy GN3 " " Natural Environment states (extract): "Development proposals which are likely to have a significant adverse impact on a site with one or more of the following designations, habitats or species will not be permitted except in exceptional circumstances where the reasons for the proposed development clearly outweigh the value of the ecological feature adversely affected and there are no appropriate alternatives: ii Local Wildlife Sites (LWS); iii Calderdale Wildlife Habitat Network (or similar designation); iv Priority habitats and species within the Calderdale Biodiversity Action Plan;" No exceptional circumstances have been put forward and there are many appropriate alternatives therefore the proposal for development is not compliant with policy GN3. Policies GN1, GN2 and GN3 all state, as one of their targets: "Increase the Borough's woodland cover each year to 2031 (amount to be determined);" We submit that the proposal for development of LP1543 is contrary to the stated aims and targets of GN1, GN2 and GN3. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" We would go further and suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. The Local Plan must also identify positively where 'locally native species rich unimproved grassland and hedgerows' may be provided as mitigation in the local area. Additionally, it is counter productive that development must restore a gap in the WHN when it is the very development that is creating such a gap. Given that the site is Greenbelt and requires exceptional circumstances to justify its removal from the Greenbelt, a habitat and species assessment should be carried out BEFORE allocation. A Protected Species Report has not been called for in the site assessment but failure to take account of this at this stage may mean that, when a Planning Application is submitted, even though the site is allocated for development in the Local Plan, the presence of species in a UK or Calderdale BAP may mean that the site cannot actually be developed or the anticipated quantum of development is undeliverable.

Accessibility We agree with the 'Distance to Bus Stop' of between 400m and 2km. However, we disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as 'less than 15mins'. Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might

expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Since journey times and distances for several other Accessibility categories involve bus journeys and walking to the bus stop then they must also now be regarded as seriously flawed. Notwithstanding our comments above, we fail to see how journey times or distances stated on the Site Assessment can be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop.

Sustainability The Sustainability Assessment scores only 4 'positive' outcomes out of 17 with 12 outcomes being 'uncertain'. However, the Accessibility RAG scoring has been used to justify the positive outcomes on two of the objectives; SA 3 " "To create and retain healthy vibrant and inclusive communities" and SA5 " "To improve accessibility to essential services, facilities and employment" Referring to our comments above on Accessibility, we believe that the RAG scoring is seriously flawed and thereby calls into question the 'positive' outcomes for SA3 and SA5. This begs the question, if only two (or at most four) of the 17 objectives are positive, how can the site be regarded as sustainable. Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents of this site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other parts of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the list of allocations until ALL underutilised sites (including those below 0.25ha) have been FULLY considered for allocation.

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5052372>

Comment ID **APX145**

Site ref (if applicable): **LP1543**

Person ID: **1124482**

Name: **Mr Ben Stables**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check

for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION/ECOLOGY Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site

assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site needs to be removed from the local plan

Additional Evidence Link:

Comment ID **APX150**

Site ref (if applicable): **LP1543**

Person ID: **1128288**

Name: **Mrs Lorraine Cornwell**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation/Ecology Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to

another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX154**

Site ref (if applicable): **LP1543**

Person ID: **1181790**

Name: **Mrs Linda Briggs**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. 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created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX158**

Site ref (if applicable): **LP1543**

Person ID: **1121443**

Name: **Mrs Christine Moussavi**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation/Ecology Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved

grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX161**

Site ref (if applicable): **LP1543**

Person ID: **1116568**

Name: **Mrs Pauline Stead**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION/ECOLOGY Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan

are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX166**

Site ref (if applicable): **LP1543**

Person ID: **1118015**

Name: **Mr Michael Halliday**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "" "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site "" 330 dwellings. This is because of the impact on West Street and Cross Lane to the south. "Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try

to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX169**

Site ref (if applicable): **LP1543**

Person ID: **1181809**

Name: **Mr Paul Stables**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX173**

Site ref (if applicable): **LP1543**

Person ID: **1124475**

Name: **Mr Peter Horne**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION/ECOLOGY Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green

Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX180**

Site ref (if applicable): **LP1543**

Person ID: **1130909** Name: **Mr Muhammad Azhar Ullah** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation/Ecology Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood

Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX185**

Site ref (if applicable): **LP1543**

Person ID: **1131102**

Name: **Mr Phil Taylor**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation/Ecology Approximately 70% of

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX191**

Site ref (if applicable): **LP1543**

Person ID: **1131193**

Name: **Mrs Susan Taylor**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX193**

Site ref (if applicable): **LP1543**

Person ID: **1126186**

Name: **Mr Andrew Spence**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX197**

Site ref (if applicable): **LP1543**

Person ID: **1181811**

Name: **Mr Simon Horsfall**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic

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expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Additional Evidence Link:

Comment ID **APX202**

Site ref (if applicable): **LP1543**

Person ID: **1128288**

Name: **Mrs Lorraine Cornwell**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked

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forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX206**

Site ref (if applicable): **LP1543**

Person ID: **1129582**

Name: **Mr Graham Shaw**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX211**

Site ref (if applicable): **LP1543**

Person ID: **1181859**

Name: **Mr Kevin Cornwell**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX212**

Site ref (if applicable): **LP1543**

Person ID: **1181896**

Name: **Mrs Mary Redman**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX216**

Site ref (if applicable): **LP1543**

Person ID: **1181903**

Name: **Mr Desmond Gee**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation/Ecology Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an

effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX218**

Site ref (if applicable): **LP1543**

Person ID: **1121702**

Name: **Mrs Lisa Izzard**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

My comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION/ECOLOGY Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed

loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

The only modifications should be to remove LP1543 from the local plan.

Additional Evidence Link:

Comment ID **APX222**

Site ref (if applicable): **LP1543**

Person ID: **1125624**

Name: **Mrs Carol McPeake**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION/ECOLOGY Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX229**

Site ref (if applicable): **LP1543**

Person ID: **1124188**

Name: **Mrs Catriona Wilcox**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION/ECOLOGY Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Additional Evidence Link:

Comment ID **APX234**

Site ref (if applicable): **LP1543**

Person ID: **1122297**

Name: **Mrs Patricia Raw**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX235**

Site ref (if applicable): **LP1543**

Person ID: **1124121**

Name: **Shooter**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX238**

Site ref (if applicable): **LP1543**

Person ID: **1128132**

Name: **Miss Janine Benner**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians.

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distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX239**

Site ref (if applicable): **LP1543**

Person ID: **1128132**

Name: **Miss Janine Benner**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX245**

Site ref (if applicable): **LP1543**

Person ID: **1128130**

Name: **Mr Ian Thewliss**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO

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considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX249**

Site ref (if applicable): **LP1543**

Person ID: **1128160**

Name: **Hainsworth**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound My house backs onto the fields and the public footpath in between this site and the site off Cock Hill Lane. Many people use these fields and the footpath, which continues across this site, for walking, along with running clubs and rambling groups. Building on these fields would give local people less open space for them to maintain a healthy lifestyle. In winter months with heavy rain and snow all the water from the fields drains down onto our property (and others nearby). I imagine this to only get worse once the grass is no longer there and has been replaced with concrete. Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more

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Accessibility By building such a large number of dwellings who on average will have 2 cars the number of additional cars and traffic to the area is frightening, especially on such narrow roads. Larger vehicles already struggle to get through roads where cars are double parked, as would emergency vehicles. I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The

total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

The site should be removed from the local plan.

Additional Evidence Link:

Comment ID **APX254**

Site ref (if applicable): **LP1543**

Person ID: **1093148**

Name: **Mr Darryl Wilcox**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan.

Additional Evidence Link:

Comment ID **APX256**

Site ref (if applicable): **LP1543**

Person ID: **1181939**

Name: **Mrs Margaret Simpson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

To remove this from the plan

Additional Evidence Link:

Comment ID **APX258**

Site ref (if applicable): **LP1543**

Person ID: **1122593**

Name: **Ms Janet Griffiths**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of

Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. 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Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation/Ecology Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX266**

Site ref (if applicable): **LP1543**

Person ID: **1122060**

Name: **Mr Carl Pope**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. 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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX269**

Site ref (if applicable): **LP1543**

Person ID: **1175701**

Name: **Mr Ian Smith**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation/Ecology Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX274**

Site ref (if applicable): **LP1543**

Person ID: **1175701**

Name: **Mr Ian Smith**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation/Ecology Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation.

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX281**

Site ref (if applicable): **LP1543**

Person ID: **1181968**

Name: **mrs christine mcdermott**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "" "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site "" 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m.

peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX282**

Site ref (if applicable): **LP1543**

Person ID: **1181968**

Name: **mrs christine mcdermott**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is

linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation/Ecology Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should

ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX284**

Site ref (if applicable): **LP1543**

Person ID: **1181339**

Name: **Miss A Walsh**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

No notice to resident to build even in immediately surrounding area to proposed sites

Do you consider the plan to be Sound?: **No**

Sound Reason:

As a resident places below the proposed area surrounding wade house road I can vow the water run off can be horrendous. The drainage is, and never has been sufficient for the run off from the fiends proposed to be build on and it can be horrendous and is a true flooding risk to certain surrounding houses, where mine is located been one. I fear building on this will only exacerbate the issue and cause stress and potential issue for residents regarding flooding and structure. Furthermore the scenery of the field is valued by resident. To take this away is taking away the village aspect and making it commercialised and not what current resident want or wish for let alone the village cannot cope with. Local services such as GP, pharmacies and bus services are already under pressure with the GP closing half day everyday already making it additionally hard for residence to get access to these facilities. The local schools are already under strain and the post office has closed leaving few and very stained services and facilities available already. The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Additionally, Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "" "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site "" 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you

might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

I feel this area (LP1543) should be removed from proposed area of building and should not be build on

Additional Evidence Link:

Comment ID **APX285**

Site ref (if applicable): **LP1543**

Person ID: **1181339**

Name: **Miss A Walsh**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

No notice to resident to build even in immediately surrounding area to proposed sites

Do you consider the plan to be Sound?: **No**

Sound Reason:

As a resident places below the proposed area surrounding wade house road I can vow the water run off can be horrendous. The drainage is, and never has been sufficient for the run off from the fiends proposed to be build on and it can be horrendous and is a true flooding risk to certain surrounding houses, where

mine is located been one. I fear building on this will only exacerbate the issue and cause stress and potential issue for residents regarding flooding and structure. Furthermore the scenery of the field is valued by resident. To take this away is taking away the village aspect and making it commercialised and not what current resident want or wish for let alone the village cannot cope with. Local services such as GP, pharmacies and bus services are already under pressure with the GP closing half day everyday already making it additionally hard for residence to get access to these facilities. The local schools are already under strain and the post office has closed leaving few and very stained services and facilities available already. The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. 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Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. 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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

I feel this area (LP1543) should be removed from proposed area of building and should not be build on

Additional Evidence Link:

Comment ID **APX300**

Site ref (if applicable): **LP1543**

Person ID: **1093761**

Name: **Mrs Sally Dyson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development.

Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Previous developments in Wharfedale, Airedale and other surrounding roads were rightly not allowed access to Cock Hill due to it being deemed a sub standard highway. Roads in the area are much busier since this development. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION/ECOLOGY Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey

time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO Journey Planner software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX303**

Site ref (if applicable): **LP1543**

Person ID: **1182040**

Name: **Mr. Derek armstead**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

HIGHWAYS DEVELOPMENT MANAGEMENT Highways Development Management say that West Street is suitable for the proposed level of development - "traffic impact would be minimal for this number of dwellings" However, they have only looked at this site in isolation, they have failed to take account of existing local conditions and development proposals on nearby sites. Highways DM have failed to consider that West Street has become an often-used cut-through for traffic from Brighouse and Denholme gate

Road towards Shelf and Bradford, trying to avoid the frequent delays at Shelf roundabout. West Street is a narrow, single track road because residents have to park at the side of the road. It has a 20mph speed restriction, speed humps and a pinch point; all measures designed to restrict traffic speed and flow along it. There is only one footpath, on the north side, opposite to the proposed site entrance, so pedestrians would have to walk in the road to access the site. If a second footpath was built it would make the road even narrower. As it is cars have to cross over the double yellow lines to pass each other. For two cars to pass side by side, one car must use the space that would be required for a second footway. In their comments for sites LP782 and LP1543 (495 houses proposed), Highways DM have stated that there will be an impact on West Street and the adjacent Cross Lane, from traffic using Cockhill Lane. They have failed to reflect these concerns in their assessment of LP1041, stating only that there will be minimal impact on West Street for a site of this size (i.e. 20 houses proposed). A suggested roundabout at the junction to the site with West Street and Cockhill Lane will be on a bend with restricted visibility and would further impede two-way traffic flow. In early 2018, the school pick up bus service on West Street was withdrawn due to congestion issues from resident's necessarily parked cars.

CONSERVATION/ECOLOGY The site is made up of an area of UK BAP Priority Habitat, Open Space and Wildlife Corridor, all of which the council claims to want to increase and protect by various policies in the Local Plan. Development will either destroy or minimise all of these designations to the point where they become ineffective as Green Infrastructure. What is the point of having these policies if the Plan allows development that is directly contrary to them. The site is part of the Wildlife Habitat Network (WHN) and links the Ancient Woodland of Sun Wood to the south east and Cockhill Clough (Greenbelt) to the northwest. Cockhill Clough has been filtered from the local plan due to its importance as a link in the WHN but development on the site will destroy the link between these areas of Green Infrastructure.

SUSTAINABILITY The Sustainability Assessment only scores 3 'positive' outcomes out of 17 but one of these positive results is based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17?

DELIVERABILITY The site currently has several designations within the RCUDP i.e. Primary Employment, Open Space Urban and Wildlife Corridor. The site assessment acknowledges that access is not possible from the south (A6036 Primary route) and that the UK BAP priority habitat, along with the hedgerow on the northern boundary, must be enhanced and retained. The western portion of the site is designated as Primary Employment, of which there exists very little in Shelf, despite the proposed number of new houses. Because of the above constraints, the remaining developable portion is isolated from any means of access, contrary to comments made by Highways Development Management, and is therefore **NOT DELIVERABLE**.

CONSERVATION/HERITAGE The site assessment correctly identifies the existence of non-designated assets in and along the dry-stone wall forming the northern site boundary, namely a horse trough and a mounting block. The horse trough is most likely to be affected by development as it is located at the most likely access point from the site onto West Street as suggested by Highways DM. The water trough is fed by an old water pipe, believed to be from the dam in Cockhill Clough. Although no longer used, the water from the trough is likely to have discharged into Sun Wood Clough Water Course which runs through the site, thus forming part of a linear link between the various water features mentioned. The water trough also forms part of a series of stone features (trough, mounting block and the GdII listed Stone Chair opposite the Duke of York Public House) along the south side of West Street. Removal or even re-location of these assets will destroy their significance.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX308**

Site ref (if applicable): **LP1543**

Person ID: **1094048**

Name: **Mr Paul Fallows**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation/Ecology Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the

north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to recreate (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX312**

Site ref (if applicable): **LP1543**

Person ID: **1124632**

Name: **Ms Leila Oates**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX321**

Site ref (if applicable): **LP1543**

Person ID: **1181972**

Name: **Miss Emma Greenwood**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX325**

Site ref (if applicable): **LP1543**

Person ID: **1092923**

Name: **Mrs Janet Armitage**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782

(either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION/ECOLOGY Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. Bats, Hares, Deer, Owls and foxes are all seen regularly in these fields. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. 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Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. The Calderdale way footpath goes through these fields and is used daily by people of all ages. Being active is vital to good health and wellbeing and as Calderdale are striving to become the most active Borough in the North of England, by 2021 it seems odd that they are also trying to

remove Greenbelt open space which people in the Village use to keep fit. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX328**

Site ref (if applicable): **lp1543**

Person ID: **1120474**

Name: **Mr Neil Roddis**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX338**

Site ref (if applicable): **LP1543**

Person ID: **1106042**

Name: **Mr Neil Booth**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Additional Evidence Link:

Comment ID **APX339**

Site ref (if applicable): **LP1543**

Person ID: **1121674**

Name: **Mr Stephen Owrid**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX348**

Site ref (if applicable): **LP1543**

Person ID: **1123397**

Name: **Mrs Jenny White**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound: GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned

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Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION/ECOLOGY Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the

comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan.

Additional Evidence Link:

Comment ID **APX362**

Site ref (if applicable): **LP1543**

Person ID: **1113729**

Name: **Miss Janet Fletcher**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site. In fact, the access is a narrow gap between terraced houses with restricted visibility on Wade House Rd (A6036) "" the busy main road linking Bradford and Halifax. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Site LP0782 (165 houses) would also be linked, adding further traffic volume with potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane and is totally unsuitable for large volumes of traffic sharing space with an increased number of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cock Hill Lane as well as the fast-moving traffic. Road safety issues have been ignored: consider how

those with buggies or mobility scooters may be put in peril without the benefit of a footway for their safe passage. Proposals for site access are very often unrealistic or very difficult, and the cumulative impact on the local highway network has not sufficiently taken account of the narrowness of individual roads, absence of pavements, difficult junctions etc. GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It would seem that the council favours development on greenbelt rather than encouraging redevelopment of smaller more urban sites that are, of course, less attractive to building companies. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant.

CONSERVATION/ECOLOGY A large proportion of the site consists of Wildlife Habitat Network/ Wildlife Corridor It is therefore an important Green Infrastructure Asset for Shelf. The Local Plan claims to promote this through its various GI policies but their proposing of this development shows little evidence of council support for green spaces. Development will destroy all but a very narrow strip of the corridor a matter of a few metres wide. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. It is difficult to see how this can be achieved. Once the greenbelt is destroyed by housing it will be gone for good; that cannot be allowed to happen. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN.

ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which conflicts with the WYMETRO 'Journey Planner' software which gives a much increased journey time to town centre. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop.

SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? This site, along with the adjoining one - LP0782 - should be removed from the plan and should remain as green belt.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Keep both site LP0782 and LP1543 as greenbelt and remove both from the Plan.

Additional Evidence Link:

Comment ID **APX440**

Site ref (if applicable): **LP1543**

Person ID: **1182419**

Name: **Mr Ben Armitage**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or

very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION/ECOLOGY Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX442**

Site ref (if applicable): **LP1543**

Person ID: **1182420**

Name: **Miss Megan Armitage**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of

a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION/ECOLOGY Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. 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What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Additional Evidence Link:

Comment ID **APX45**

Site ref (if applicable): **LP1543**

Person ID: **1093066**

Name: **Mrs Susan Crossley**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic

sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc.

CONSERVATION/ECOLOGY Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN.

ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop.

SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not

see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX467**

Site ref (if applicable): **LP1543**

Person ID: **1113733**

Name: **Mr Derek Bennett**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt Land There has been no compelling argument put forward for removing this land from its greenbelt protection status. The Site Assessment shows this site performs strongly against the five purposes of Greenbelt; fulfilling three of the five purposes. Whilst it may not fulfil Purpose IV a common sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to the adjoining land, LP0782. As LP0782 fulfils Purpose I then this site must also do so. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires 'exceptional circumstances' to be demonstrated for land to be taken out of Greenbelt. No such circumstances have been put forward. Furthermore, it is difficult to see how there may be such exceptional circumstances in favour of development when there are many small sites in this urban area that have been omitted from the plan on grounds of their small plot size. It is easier and more profitable to eat up large chunks of green belt land. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant and should not be allowed to proceed. Highways & Access Highways Development Management admits there is only one possible access point to the site; that being at Wade House Rd (A6036) and this has restricted visibility. This statement greatly understates the actual situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a site visit will show. Visibility for egress onto the busy A6036 Bradford to Halifax Road would be limited and potentially dangerous. Highways DM mention a possible access point in the North but give no details rendering it impossible possible to comment on. Seemingly this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic volume. Accessing the site through LP0782 will put increased traffic onto

CockHill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. There are no less than three stables on Cock Hill; one of which is a riding school which numbers very young children and disabled amongst its clients. Cock Hill is frequently used for horse riding (I am a resident) Pedestrians accessing the nearest junior school or public bus stop would also have to use Cock Hill Lane alongside the fast-moving traffic and without the benefit of a footpath for safer passage. As stated here are common features in the assessments of LP1543 and 0782. Crucially that the proposals for site access are unrealistic/ very difficult, and that the cumulative impact on the local highway network has either not been assessed, or, where a judgement about the capacity of the LHN has been made, it is unrealistic when considering the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation/Ecology The Bradford area of Queensbury to the north is rapidly developing greenbelt land towards these sites (LP1543/0782); the corridor between them ever narrowing. This makes the greenbelt land vital for wildlife survival. Tawny owls, barn owls and bats among many species using these fields for hunting and for their very survival. Around 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf. The Local Plan pays lip service to this through its various GI policies but shows little evidence of supporting in reality.. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development,(See earlier comment re: Queensbury) thus an 'island' of WHN surrounded entirely by development, would be created. A matter of time before it is swamped with more building and Bradford and Shelf become one! Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss of greenbelt. The remaining strip of WHN would be so compromised by recreational disturbance from this development that it would become unviable as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented. Development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to account for the cumulative impact of this loss. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows. However the Plan does not say how and where this will be created in the local area. Wildlife cannot accommodate development by moving to another field when their habitat is destroyed. To try to re-create wildlife habitat elsewhere when the status quo functions perfectly acceptable is futile. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, A full species survey is required to identify the range of flora and fauna present in this area of WHN. Accessibility Whilst the 'Distance to Bus Stop' of between 400m and 2km. Is accurate several of the RAG scores for journey times aren't; notably the 'Journey time to Town Centre' which is shown as "less than 15mins" The WYMETRO 'Journey Planner' gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG score of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a total walking distance of up to 2.5km. A more realistic journey time would be 40mins. Notwithstanding the comments above journey times or distances stated on the Site Assessment become hypothetical when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient or safe to walk to school or bus stop.

Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores and should be disregarded (see above). The site cannot be regarded as sustainable when it has only 2 positive scores out of a possible 17. Open space Regarding the loss of open space, it is seriously flawed to consider the loss of the site will be felt only by residents adjacent to the site. The area around the site is used by walking groups, equestrians, dog walkers and cycling clubs for their recreation. Furthermore the site itself forms part of the catchment area of Shelf and forms the essence of its very identity. As the urban boundary of Shelf expands open space grows ever more distant from existing housing, boundaries merge and individuality is lost amongst a housing conglomeration. Once built upon it is irreversible and green land will be lost for both this and for all future generations. The emotional and psychological benefits of such green spaces in our busy urban lives is well documented!

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Remove from local plan

Additional Evidence Link:

Comment ID **APX468**

Site ref (if applicable): **LP1543**

Person ID: **977588**

Name: **Ms Marta Kovacs**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

elow are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a

possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. The plan takes no account of all the development in Bradford District MC which abuts this site. The amount of traffic all goes into the major road, which is already at saturation point during rush hours, and is extremely busy at other times. This is unsustainable, and there is no plan to help traffic movement possible here CONSERVATION/ECOLOGY Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to

Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX49**

Site ref (if applicable): **LP1543**

Person ID: **715153**

Name: **Mr Brian Crossley**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires

a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION/ECOLOGY Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a

total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site must be removed from the list of proposed allocations.

Additional Evidence Link:

Comment ID **APX507**

Site ref (if applicable): **LP1543**

Person ID: **1122023**

Name: **Miss Rachel Cubitt**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have

been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation/Ecology Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. Accessibility I agree with the 'Distance to

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Additional Evidence Link:

Comment ID **APX539**

Site ref (if applicable): **LP1543**

Person ID: **1182575**

Name: **Mr Darren Hodgson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I

then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation/Ecology Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. 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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX546**

Site ref (if applicable): **LP1543**

Person ID: **1182664**

Name: **Mr Jan Zurek**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of

Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. 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It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. 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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Additional Evidence Link:

Comment ID **APX548**

Site ref (if applicable): **LP1543**

Person ID: **1182664**

Name: **Mr Jan Zurek**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. 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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Additional Evidence Link:

Comment ID **APX55**

Site ref (if applicable): **LP1543**

Person ID: **1094032**

Name: **Mrs Sue Chadwick**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION/ECOLOGY Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX553**

Site ref (if applicable): **LP1543**

Person ID: **1181763**

Name: **Mr Bryan Harkness**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation/Ecology Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan

are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Additional Evidence Link:

Comment ID **APX558**

Site ref (if applicable): **LP1543**

Person ID: **1181746**

Name: **Mr Philip Cannon**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

I live a mile or so from this farmland, and at peaks times traffic heading towards Bradford will often be queued all the way back to my house and beyond. Also, the only point of access to this site is from Wade House Road, and the width of this access is incredibly narrow, as is the pavement that fronts it. Therefore, a dangerous visibility problem would exist in a particularly busy location . I am a property developer myself, and this access point/visibility issue stands out a mile. Wade House Road, which is only a short stretch of road anyway, is also just a stone's throw away from Carr House Lane and the notorious mini roundabout with Cooper Lane "" one of the worse accident black spots in the whole county. Police records will confirm this. So any more housing anywhere around here and the extra traffic this will generate will only make an already bad situation even worse "" especially a poorly considered monster proposal like this one. Proposed development LPO782, off Cock Hill Lane, is also right next to this site, which means if these developments are allowed to go ahead, they will be linked, meaning almost 500 houses on what is effectively the same plot of land! Also, Cock Hill Lane is just a narrow country lane, and in parts is single track with no pavement. It is also riddled with blind bends, and street lighting is extremely poor. This whole thing is also an ugly intrusion into our greenbelt. And it is for these reasons that I consider proposed development LP1543 (and too its partner site LP0782) to be totally unsound.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX564**

Site ref (if applicable): **LP1543**

Person ID: **1130177**

Name: **Miss Sarah Butler**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that'exceptional

circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." "Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc.

CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings.

CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations.

ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" "Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" "stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane

between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX569**

Site ref (if applicable): **LP1543**

Person ID: **1121289**

Name: **Mr Tony Hubbert**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

There is no depth to the consideration of schools or increased traffic

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX575**

Site ref (if applicable): **LP1543**

Person ID: **1182765**

Name: **Mr James Shepstone**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

The plans to develop such a large greenbelt area go against the environmental responsibilities of the council. More brownfield sites should be investigated before any further greenbelt areas are even considered. This site has poor access and the number of houses that would be built on this site would cause impossible levels of extra traffic for the local infrastructure to cope with. The local facilities are already full. The area already has issues with flooding and serious accessibility issues in adverse weather, and the further development of the land will make this even worse GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been

assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION/ECOLOGY Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Additional Evidence Link:

Comment ID **APX579**

Site ref (if applicable): **LP1543**

Person ID: **1182781**

Name: **Mr David Robinson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns"☒As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "" "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site "" 330 dwellings. This is because of the impact on West Street and Cross Lane to the south."☒Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION (HERITAGE) Listed Buildings at 3-7 Cockhill Lane are adjacent to the site and would be

severely affected by development and the site access. Because the site is fairly flat next to Cock Hill Lane, a simple buffer strip as proposed is not enough to reduce the impact on the listed buildings. Demolition of existing dry-stone walls to create an access and ANY building on this site will have a severe impact on the setting of the listed buildings. CONSERVATION (ECOLOGY) The site is farmland, currently used for grazing and hay production. It supports a wide variety of wildlife but more importantly it supports a priority species listed in the Calderdale Biodiversity Action Plan (BAP) [2003-2010, awaiting update]. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX59**

Site ref (if applicable): **LP1543**

Person ID: **1123394** Name: **Mrs Barbara Bartle** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION/ECOLOGY Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the

north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX598**

Site ref (if applicable): **LP1543**

Person ID: **1182838**

Name: **Mr Gary Walsh**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

No notice to surrounding residents on plans to build

Do you consider the plan to be Sound?: **No**

Sound Reason:

As a resident places below the proposed area surrounding wade house road I can vow the water run off can be horrendous. The drainage is, and never has been sufficient for the run off from the fiends proposed to be build on and it can be horrendous and is a true flooding risk to certain surrounding houses, where mine is located been one. I fear building on this will only exacerbate the issue and cause stress and potential issue for residents regarding flooding and structure. Furthermore the scenery of the field is valued by resident. To take this away is taking away the village aspect and making it commercialised and not what current resident want or wish for let alone the village cannot cope with. Local services such as GP, pharmacies and bus services are already under pressure with the GP closing half day everyday already making it additionally hard for residence to get access to these facilities. The local schools are already under strain and the post office has closed leaving few and very stained services and facilities available already. The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV"" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Additionally, Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated "" "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site "" 330 dwellings. This is because of the impact on West

Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

The plan to build on this site should be withdrawn/rejected for the reasons stated above

Additional Evidence Link:

Comment ID **APX600**

Site ref (if applicable): **LP1543**

Person ID: **1182839**

Name: **Mrs Wendy Walsh**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

As a resident places below the proposed area surrounding wade house road I can vow the water run off can be horrendous. The drainage is, and never has been sufficient for the run off from the fiends proposed to be build on and it can be horrendous and is a true flooding risk to certain surrounding houses, where mine is located been one. I fear building on this will only exacerbate the issue and cause stress and potential issue for residents regarding flooding and structure. Furthermore the scenery of the field is valued by resident. To take this away is taking away the village aspect and making it commercialised and not what current resident want or wish for let alone the village cannot cope with. Local services such as GP, pharmacies and bus services are already under pressure with the GP closing half day everyday already making it additionally hard for residence to get access to these facilities. The local schools are already under strain and the post office has closed leaving few and very stained services and facilities available already. The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling four of the five purposes. However, due to its proximity to the listed buildings at 3-7 Cock Hill, it also fulfils Purpose IV" "To preserve the setting and special character of historic towns" As a site that fulfils ALL FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Additionally, Access to the site will be from Cock Hill Lane, either from the north via High Cross Lane or the south via West Street/Shelf Hall Lane. From either direction, but particularly from the south, Cock Hill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit (reduced to 20mph only near West Street junction) and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cock Hill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. Linking this site to LP1543 (as seems necessary according to Highways DM's site assessment) will give access to 495 additional houses onto Cock Hill Lane. In their assessment of LP1543, Highways DM have stated " "Cock Hill Lane could provide a link through to the adjacent site [LP1543] but couldn't accommodate traffic from the whole site " " 330 dwellings. This is because of the impact on West Street and Cross Lane to the south." Strangely Highways DM have failed to raise similar comments against LP0782 which would also be accessed via Cockhill Lane and would increase the number of dwellings to 495. Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such

factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, notably 'Journey time to Town Centre' which is shown as "between 15 and 30mins" Referring to the WYMETRO 'Journey Planner' software, this gives a total journey time to town centre of 40-41mins at a.m. peak time, Mon to Fri. far greater than the 'between 15 and 30mins' stated in the Accessibility RAG scores. The total journey time increases to 42-46mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. There are no public bus services from the site to the school and the shortest route will be via Cockhill Lane/Shelf Hall Lane. Again, using the WYMETRO software the journey time is 25mins, not the "less than 15 mins" stated in the Accessibility RAG scoring. However, what the Accessibility RAG scoring has also failed to take account of is that Cockhill Lane is a narrow country lane between dry stone walls, with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with pedestrians, most notably elderly, disabled or school children. Putting aside journey times for the moment, forcing pedestrians to use Cockhill Lane as an access route to school and bus stops is utterly irresponsible and will have disastrous consequences for their safety and is ultimately UNSUSTAINABLE. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? OPEN SPACE When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

The plan should be rejected and this suggested area should not be build on for the reason listed above

Additional Evidence Link:

Comment ID **APX606**

Site ref (if applicable): **Lp1543**

Person ID: **1182732**

Name: **Mr Ian Schorfield**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

This is green belt land home to many protected species of wildlife including deer hares foxes birds of prey and bats.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX609**

Site ref (if applicable): **LP1543**

Person ID: **1124325**

Name: **Mrs Susan Hainsworth**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The

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Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation/Ecology Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. 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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

The site should be removed from the local plan.

Additional Evidence Link:

Comment ID **APX613**

Site ref (if applicable): **LP1543**

Person ID: **1182858**

Name: **Mrs Christine Firth**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will

put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION/ECOLOGY Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. 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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Additional Evidence Link:

Comment ID **APX66**

Site ref (if applicable): **LP1543**

Person ID: **1116616**

Name: **Mrs Susan Thompson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX70**

Site ref (if applicable): **LP1543**

Person ID: **1179313**

Name: **Miss Natalie Kelly**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX702**

Site ref (if applicable): **LP1543**

Person ID: **1095525**

Name: **Mrs Hilary Naylor**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

The proposal for building on this greenbelt site would impact massively on an already stretched infrastructure in Shelf. Access into and out of the proposed site onto Wadehouse road would exacerbate existing traffic problems when, at peak times traffic is often at a stand still, or at best slow moving. The number of homes proposed would just add to an already traffic clogged situation and the adjoining site with access onto Cock Hill lane is no better for access as that lane is narrow and twisty. I can envisage traffic using the newly built estate as a rat run to cut out driving on the main road in to Shelf from Queensbury. The fields themselves are one of the few safe havens for our dwindling wildlife. Bats now habitat the area and I've seen herons on this land. There is also a public footpath running through here. But another concern I have is the flooding in this area which would become a much worse problem if there was building on it.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX728**

Site ref (if applicable): **LP1543**

Person ID: **1181207**

Name: **Miss Marie A Quashie**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782

(either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION/ECOLOGY Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX737**

Site ref (if applicable): **Lp1543**

Person ID: **1129819**

Name: **Miss Sonia Maud**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians.

Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation/Ecology Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more

distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Additional Evidence Link:

Comment ID **APX74**

Site ref (if applicable): **LP1543**

Person ID: **1121374**

Name: **Mrs Nicola Parker**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends

it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation/Ecology Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the

assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX750**

Site ref (if applicable): **LP1543**

Person ID: **1118097**

Name: **Mrs Sarah Jones**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt Land There has been no compelling argument put forward for removing this land from its greenbelt protection status. The Site Assessment shows this site performs strongly against the five purposes of Greenbelt; fulfilling three of the five purposes. Whilst it may not fulfil Purpose IV a common sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to the adjoining land, LP0782. As LP0782 fulfils Purpose I then this site must also do so. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires 'exceptional circumstances' to be demonstrated for land to be taken out of Greenbelt. No such circumstances have been put forward. Furthermore, it is difficult to see how there may be such exceptional circumstances in favour of development when there are many small sites in this urban area that have been omitted from the plan on grounds of their small plot size. It is easier and more profitable to eat up large chunks of green belt land. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant and should not be allowed to proceed. Highways & Access Highways Development Management admits there is only one possible access point to the site; that being at Wade House Rd (A6036) and this has restricted visibility. This statement greatly understates the actual situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a site visit will show. Visibility for egress onto the busy A6036 Bradford to Halifax Road would be limited and potentially dangerous. Highways DM mention a possible access point in the North but give no details rendering it impossible possible to comment on. Seemingly this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able

to cope with the increased traffic volume. Accessing the site through LP0782 will put increased traffic onto Cock Hill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. There are no less than three stables on Cock Hill; one of which is a riding school which numbers very young children and disabled amongst its clients. Cock Hill is frequently used for horse riding (I am a resident) Pedestrians accessing the nearest junior school or public bus stop would also have to use Cock Hill Lane alongside the fast-moving traffic and without the benefit of a footpath for safer passage. As stated here are common features in the assessments of LP1543 and 0782. Crucially that the proposals for site access are unrealistic/ very difficult, and that the cumulative impact on the local highway network has either not been assessed, or, where a judgement about the capacity of the LHN has been made, it is unrealistic when considering the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation/Ecology The Bradford area of Queensbury to the north is rapidly developing greenbelt land towards these sites (LP1543/0782); the corridor between them ever narrowing. This makes the greenbelt land vital for wildlife survival. Tawny owls, barn owls and bats among many species using these fields for hunting and for their very survival. Around 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf. The Local Plan pays lip service to this through its various GI policies but shows little evidence of supporting in reality.. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development,(See earlier comment re: Queensbury) thus an 'island' of WHN surrounded entirely by development, would be created. A matter of time before it is swamped with more building and Bradford and Shelf become one! Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss of greenbelt. The remaining strip of WHN would be so compromised by recreational disturbance from this development that it would become unviable as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented. Development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to account for the cumulative impact of this loss. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows. However the Plan does not say how and where this will be created in the local area. Wildlife cannot accommodate development by moving to another field when their habitat is destroyed. To try to re-create wildlife habitat elsewhere when the status quo functions perfectly acceptable is futile. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, A full species survey is required to identify the range of flora and fauna present in this area of WHN. Accessibility Whilst the 'Distance to Bus Stop' of between 400m and 2km. Is accurate several of the RAG scores for journey times aren't; notably the 'Journey time to Town Centre' which is shown as "less than 15mins" The WYMETRO 'Journey Planner' gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG score of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a total walking distance of up to 2.5km. A more realistic journey time would be 40mins. Notwithstanding the comments above journey times or distances stated on the Site Assessment become hypothetical when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously

make a great deal of difference when deciding if it is time efficient or safe to walk to school or bus stop. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores and should be disregarded (see above). The site cannot be regarded as sustainable when it has only 2 positive scores out of a possible 17. Open space Regarding the loss of open space, it is seriously flawed to consider the loss of the site will be felt only by residents adjacent to the site. The area around the site is used by walking groups, equestrians, dog walkers and cycling clubs for their recreation. Furthermore the site itself forms part of the catchment area of Shelf and forms the essence of its very identity. As the urban boundary of Shelf expands open space grows ever more distant from existing housing, boundaries merge and individuality is lost amongst a housing conglomeration. Once built upon it is irreversible and green land will be lost for both this and for all future generations. The emotional and psychological benefits of such green spaces in our busy urban lives is well documented!

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Remove from local plan

Additional Evidence Link:

Comment ID **APX760**

Site ref (if applicable): **LP1543**

Person ID: **1183336**

Name: **Mr Andrew Izzard**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site LP1543 should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX765**

Site ref (if applicable): **LP1543**

Person ID: **1130145**

Name: **Mrs Vicki Gibson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House

Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. 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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX77**

Site ref (if applicable): **Lp1543**

Person ID: **1178669**

Name: **Mr Anthony Marcou**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

As a new resident of Broad Ings Way, I have not received any notification regarding the intention to build on the green belt to the rear of my property, this wasn't made clear when I purchased the property in April 2017 and didn't come up in any of the legal searches. This would have played a major part in the decision to move here..

Do you consider the plan to be Sound?: **No**

Sound Reason:

I'm not sure whether this is the best place to present my comments regarding the infrastructure to support this huge development - the following areas are in my opinion insufficient or need addressing; Access roads/traffic local amenities (shops/supermarkets/restaurants etc) Over subscribed schools Hospitals/GP's Pollution/quality of air Lack of green belt/local parks (Shelf Park is clearly not funded anymore!) Sufficient renewable energy options Effect on house prices due to over subscribing the area

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Nothing seen to address this point

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX772**

Site ref (if applicable): **lp1543**

Person ID: **1183380**

Name: **Mr Andrew Izzard**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc.

CONSERVATION/ECOLOGY Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Remove this site from the local plan.

Additional Evidence Link:

Comment ID **APX78**

Site ref (if applicable): **LP1543**

Person ID: **1130104**

Name: **Mr Wies Mielniczyn**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic

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see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX789**

Site ref (if applicable): **lp1543**

Person ID: **1183435**

Name: **Mr Daniel Naylor**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX797**

Site ref (if applicable): **LP1543**

Person ID: **1092926**

Name: **Miss Christine Firth**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a

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Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Additional Evidence Link:

Comment ID **APX80**

Site ref (if applicable): **LP1543**

Person ID: **975323**

Name: **Mr Charles Shaw**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5046678>

Comment ID **APX808**

Site ref (if applicable): **LP1543**

Person ID: **1183462**

Name: **Mrs Sarah Heslop**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX813**

Site ref (if applicable): **LP1543**

Person ID: **1106043**

Name: **Mrs Pippa Booth**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX816**

Site ref (if applicable): **LP1543**

Person ID: **1181934**

Name: **Mrs Debra Moxon**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

I believe that this site should be removed from the local plan

Additional Evidence Link:

Comment ID **APX822**

Site ref (if applicable): **LP1543**

Person ID: **1117278**

Name: **Mr Bruce Whittaker**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

repeat of previous comments..not thought thru..traffic..noise..lack of amenities..schools..drs etc..roads comp.inadequate..south lane already dangerous speeding rat run not policed or monitored (all messages to council are ignored)..death of a village..abuse of greenfields..loss of environment..wild life and hundreds of peoples peace of mind.Please stop all this..

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX823**

Site ref (if applicable): **LP1543**

Person ID: **1117278**

Name: **Mr Bruce Whittaker**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

not thought thru..potential flooding (drainage v poor),no access roads..already crazy traffic...no amenities,,adding to demise of village...further loss of grasslands with id and wild life..there are many brownfield sites...industrial derelict sites,disused buildings ok for development....stop all this...

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX828**

Site ref (if applicable): **LP1543**

Person ID: **1121978**

Name: **Mrs Bridget Simpson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development.

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX832**

Site ref (if applicable): **LP1543**

Person ID: **1128166**

Name: **Miss Alice Simpson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX84**

Site ref (if applicable): **LP1543**

Person ID: **1116615**

Name: **Mrs Cathryn Zurek**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

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Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION/ECOLOGY Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to

identify the range of flora and fauna present in this area of WHN. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX845**

Site ref (if applicable): **LP1543**

Person ID: **1182397**

Name: **Mrs Teresa Spencer**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Conservation - This area is home to a vast amount of different species of animals. I have seen bats, owls, a whole host of different wild birds living in these fields, rabbits... to name but a few. We also have hedgehogs living on and around these fields and I have photographic evidence of this. You cannot simply expect wildlife to accommodate development by moving to another place when their habitat is destroyed.

Horses and cows graze on this land. There is also a right of way passage/bridle path running along and next to this site and this must be retained. Land itself - this land, in wet weather becomes water logged. What's more, because this land is not flat, and in fact, very steep in parts, what will drainage be like if 500 new homes are built on the two sites and how will this affect the homes already next to the fields? This is a major FLOODING risk to these homes. Accessibility - The only access point that this site has is a narrow gap between terraced houses on the main road. How can 350 houses have one access point like this which goes directly onto an already congested road - it's almost impossible to turn right onto the main road even now with all the traffic. Even if it was linked to the proposed Cockhill Lane site, two very ineffective access points for 500 houses would be a nightmare and extremely DANGEROUS. Cockhill Lane is a steep, narrow country road with no footpaths and even now, it is difficult to navigate past parked cars. Peak hour on a morning and evening is a nightmare and with a MUCH increased flow of traffic which would result from building on this site, it would be extremely dangerous. Effect on traffic - The main road in Shelf, even at quieter times in the day, is busy. Peak hour on a morning and evening is a nightmare and with a MUCH increased flow of traffic which would result from building on this site, it would be extremely dangerous. Shelf Primary School is close to the proposed site and at the moment it is a nightmare on a morning and afternoon with parents dropping off and picking up both by car and by walking. It would be a very dangerous area to be walking or driving around at this time of the day especially with the proposed plan on Cockhill Lane (LP0782) aswell. Village life - How can Shelf, a small village, cope with the potential of 500 new homes? This could mean around 1000 new adults to the area and if every household had 2 children, there could be 1000 new children all needing a school place. Where would the children go to school? Primary schools and in particular, secondary schools are completely over-subscribed. The doctors's surgery in Shelf is struggling to cope even now to serve its residents! People are having to join surgeries in other areas such as Hipperholme and Northowram. Shelf's infrastructure would not be able to cope with these significant added pressures. I have been informed that government legislation says that a high percentage of anyone moving to an area and living in new homes in Calderdale have to be employed within Calderdale. With 500 new homes proposed on just these two sites, how can potentially up to 1000 new adults gain employment within Calderdale? Greenbelt land - The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX850**

Site ref (if applicable): **LP1543**

Person ID: **1178529**

Name: **Mr & Mrs Pickard**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are our concerns/views as to why we consider this local plan is unsound and not sustainable (indeed 12 out of the 16 objectives in the sustainability report appraisal linked to this site are UNCERTAIN):-

Listed Buildings There are listed buildings in the very close vicinity to this site (3-7 Cockhill Lane). We need to value their existence which is integral to the history of Shelf village and to protect their longevity.

Risk of flooding Given the raised height and steep gradient of this land there would be high 'run off' rates for flooding with impacts for existing properties and the main village highway which are all below this site. As residents of Parkstone Rise a particular concern would be to possible damage to the footings of homes like ours which are on the edge of this site. Even in its' current use as grazing pastures this land easily becomes completely water logged (clay soil and former mining land in some parts) The current natural drainage system has proven that with our change in climate bringing wetter periods of weather than ever before to add a significant number of new homes onto this land would mean there would be knock on effects for residents living below this land. There would also need to be major financial investment to renew old drainage systems.

Increase in traffic volumes Such a large new build estate/or estates would significantly increase traffic volumes in an area which is already struggling to cope. Rather than reduce green house gas emissions it would actually increase them enormously. We already have a growing concern over the increase of motor vehicles stop/starting within the village and it is well documented that there is a link between particulates in vehicle emissions and Asthma to increase the traffic volumes - slow the traffic to stop start even further would make this a major issue for pedestrians particularly the young travelling to and from school, the elderly and vulnerable individuals. There is already a concern amongst residents like ourselves that it is getting to a 'grid lock' stage on the country lanes and access points to homes e.g. it is very hard to access homes from Broad Ings way and Shelf Hall Road etc at school run times (and travel to work times) due to the high number of large motor vehicles which park on the narrow roads making access for singular traffic only often coming to an impasse. To introduce significantly more local traffic to this area would exasperate the situation to a grid lock. To build huge estates of over 500 homes (even 330 odd on one site) would certainly have an immediate negative impact on residents health and wellbeing. In general 24 years ago on a 'new build estate' residents would have a maximum of 2 vehicles per household -now on modern estates aimed at families and young people this has increased to one per driver per household where residents are aged over 17years. (so in many cases as 'the norm' there are 4 residents with 4 cars or two residents with three cars or 1 resident with 2 cars) this trend is going to increase not decline. Do we really want to be responsible for causing grid lock and toxic fumes on our village roads for future generations?

Biodiversity and geo-diversity Part of this site lies within a wildlife habitat network (and is surrounded by livery stables) so we have genuine concerns about the negative impacts any build would have on the biodiversity and geo-diversity. The Landscape Any buildings on this land would completely devastate the landscape given its' position it can be viewed from an extensive panorama. This land is excellent grazing land and in our view should remain as such. The Calderdale way runs through this land the well worn paths show how much it is used (e.g by ramblers/runners/dog walkers/residents etc.). Connecting with nature is promoted by Calderdale Council and the NHS as a way of reducing stress, improving mental health and improving overall wellbeing. The impacts of building on this site would do the opposite as it would remove almost all of the green open space the village of Shelf has. The start of the Calderdale way from this position would be a built up site.

Highways Aside from our belief that the proposed access to this development is totally unsustainable the impacts of so many more hundreds of vehicles would be highly negative on all the adjoining highways and junction points. (e.g. in the immediate vicinity and with a ripple effect such as Cockhill lane, Shelf hall lane, Shelf and Wibsey roundabouts, Odsal top, Stump Cross, Lightcliffe traffic lights and Queensbury etc Future projections of 20 years after such a build would be 'grid lock' with no spare land to sort out the road

issues. Housing Services Whilst we fully appreciate the need for more affordable housing is a national issue "" Shelf as a small village is already surrounded by large social housing developments e.g. Belle Vue, Buttershaw, Queensbury and Woodside . Residents from all these areas use and value the greenbelt space which Shelf currently has "" take this away and Shelf becomes just a big housing development "" not a 'rural' village. Ecology Hedgehogs are an endangered species and their populations are in steep decline. When the existing 'new' homes adjoining the proposed site were built approx. 24 years ago the negative impact on wildlife was significant (hedgehogs/foxes/badgers/birds/deer/field mice/harvest mice/shrews etc) so much so that it took more than 15 years for the Hedgehog population to come back to the area "" and some species have not returned. For the last 6 years plus we have been feeding Hedgehogs every day (except during hibernation) and so have been very mindful of how even small changes to the environment can have a massive impact on their numbers. (e.g.paving over lawns/erecting fencing/removing hedges etc) The increase in traffic and brighter new street lighting along with less green spaces have already resulted in more recent Hedgehog deaths around Cockhill Lane, Shelf Hall Lane and Broad Ings Way. To build such a huge number of new homes on this greenbelt site would in our opinion seal their fate! We need the Greenbelt, hedgerows, wild plants, grassland and bogs to remain. The BAT population is also not as active as it was 24 years ago when the last massive change to the local environment took place. However, we are still lucky enough to see bats in Parkstone Rise and over the greenbelt fields. If this land were to be built on we would knowingly be taking away the natural habitat of a Protected species. In this generation of new technologies we need our green spaces more than ever to ensure the health and wellbeing of the residents of Shelf and other local villages. Once they are gone they are gone "" it is our responsibility to ensure this does not happen. Thank you for taking our views into consideration.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Remove from the local plan

Additional Evidence Link:

Comment ID **APX852**

Site ref (if applicable): **LP1543**

Person ID: **1183502**

Name: **mr Richard Spencer**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Conservation - This area is home to a vast amount of different species of animals. I have seen bats, owls, a whole host of different wild birds living in these fields, rabbits... to name but a few. We also have hedgehogs living on and around these fields and I have photographic evidence of this. You cannot simply expect wildlife to accommodate development by moving to another place when their habitat is destroyed.

Horses and cows graze on this land. There is also a right of way passage/bridle path running along and next to this site and this must be retained. Land itself - this land, in wet weather becomes water logged. What's more, because this land is not flat, and in fact, very steep in parts, what will drainage be like if 500 new homes are built on the two sites and how will this affect the homes already next to the fields? This is a major FLOODING risk to these homes. Accessibility - The only access point that this site has is a narrow gap between terraced houses on the main road. How can 350 houses have one access point like this which goes directly onto an already congested road - it's almost impossible to turn right onto the main road even now with all the traffic. Even if it was linked to the proposed Cockhill Lane site, two very ineffective access points for 500 Powered by Objective Online 4.2 - page 1 houses would be a nightmare and extremely DANGEROUS. Cockhill Lane is a steep, narrow country road with no footpaths and even now, it is difficult to navigate past parked cars. Peak hour on a morning and evening is a nightmare and with a MUCH increased flow of traffic which would result from building on this site, it would be extremely dangerous. Effect on traffic - The main road in Shelf, even at quieter times in the day, is busy. Peak hour on a morning and evening is a nightmare and with a MUCH increased flow of traffic which would result from building on this site, it would be extremely dangerous. Shelf Primary School is close to the proposed site and at the moment it is a nightmare on a morning and afternoon with parents dropping off and picking up both by car and by walking. It would be a very dangerous area to be walking or driving around at this time of the day especially with the proposed plan on Cockhill Lane (LP0782) aswell. Village life - How can Shelf, a small village, cope with the potential of 500 new homes? This could mean around 1000 new adults to the area and if every household had 2 children, there could be 1000 new children all needing a school place. Where would the children go to school? Primary schools and in particular, secondary schools are completely over-subscribed. The doctors's surgery in Shelf is struggling to cope even now to serve its residents! People are having to join surgeries in other areas such as Hipperholme and Northowram. Shelf's infrastructure would not be able to cope with these significant added pressures. I have been informed that government legislation says that a high percentage of anyone moving to an area and living in new homes in Calderdale have to be employed within Calderdale. With 500 new homes proposed on just these two sites, how can potentially up to 1000 new adults gain employment within Calderdale? Greenbelt land - The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Additional Evidence Link:

Comment ID **APX853**

Site ref (if applicable): **LP1543**

Person ID: **1130843**

Name: **Mr Patrick Rushgrove**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation/Ecology Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan

are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing. What the Council do not seem to appreciate is the abundance of wildlife that uses this area as a wildlife corridor. This area sees deer virtually every day either passing through or living as had had again this year in the woods and using the fields as their larder. where will they go? When they are gone, they are gone. I would expand on the access issues. You can argue the only sane entry point is the main road. But that is insane. the road cannot cope now with the volume of traffic so how would it do so if this development went ahead. would we see more traffic lights, more delays on a route used numerous times a day by the emergence services in a blue light situation. Access to the North via South Lane is again a none starter. this road already has a weight restriction on it, it has a 'pince' point where it meets Shelf Moor Road where it goes down to one lane only and has seen numerous accidents over the years including one fatality in the last year. It is already a rat run and cannot take anymore. The village has a small doctors surgery with no space to expand and could not cope with the influx of additional patients. Both junior Schools are full. Both have very poor access and neither of them is on a bus route. Again, how would they cope?

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX855**

Site ref (if applicable): **LP1543**

Person ID: **1130843**

Name: **Mr Patrick Rushgrove**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been

assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation/Ecology Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX862**

Site ref (if applicable): **LP1543**

Person ID: **1129601**

Name: **Mrs Lorna Eastwood**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX87**

Site ref (if applicable): **LP1543**

Person ID: **1092925**

Name: **Mrs Jean Maria Shaw**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of

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What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing. Shelf Hall Lane which will be one of the main access roads to the site is already inadequate for

the current level of traffic. It is dangerously narrow in parts and is also the main road for the Junior & Infant School. Further development will exacerbate this problem and could well prove a danger to all users.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Additional Evidence Link:

Comment ID **APX874**

Site ref (if applicable): **LP1543**

Person ID: **1129074**

Name: **Mrs Z Hillam**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan.

Additional Evidence Link:

Comment ID **APX878**

Site ref (if applicable): **Lp1543**

Person ID: **1130687**

Name: **Miss Kate Owram**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

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There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION/ECOLOGY Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. 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based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

this site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX883**

Site ref (if applicable): **LP1543**

Person ID: **1183524**

Name: **mr Steve Amos**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX89**

Site ref (if applicable): **LP1543**

Person ID: **1130366**

Name: **Mrs Amy Roberts**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details

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ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX892**

Site ref (if applicable): **LP1543**

Person ID: **1123556**

Name: **Mrs Beth Sky Horsfall**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX913**

Site ref (if applicable): **LP1543**

Person ID: **1102440**

Name: **Mrs Ann Harris**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional

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However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. 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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX92**

Site ref (if applicable): **LP1543**

Person ID: **1092922**

Name: **Mr David Nudds**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site

is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. 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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX920**

Site ref (if applicable): **LP1543**

Person ID: **1093163**

Name: **Mr Richard Degnan**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. 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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX921**

Site ref (if applicable): **LP1543**

Person ID: **1129276**

Name: **Mr Roger Briggs**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION/ECOLOGY Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX931**

Site ref (if applicable): **LP1543**

Person ID: **1121652**

Name: **Mrs J Feltham**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION/ECOLOGY Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan

are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Additional Evidence Link:

Comment ID **APX939**

Site ref (if applicable): **LP1543**

Person ID: **1128586**

Name: **Mr Martin Wood**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

A ludicrous, barely accessible site with an incredibly weak case for development. Shame on all involved for keeping this nonsense on the plan. GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc.

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This absurd site should be removed from the plan.

Additional Evidence Link:

Comment ID **APX945**

Site ref (if applicable): **LP1543**

Person ID: **1130862**

Name: **Mr Philip Carter**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation/Ecology Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of

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What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing. Further general comments: 1) Winter water 'run-off' currently floods Wade House Road resulting in disruption to traffic and the flooding of cellars in roadside houses. Currently the 'sponge' effect of these greenbelt fields acts to alleviate some of this flooding and change of use would result in unacceptable additional flooding. 2) Currently there is standing traffic in this area during certain times of the day, this includes HGV traffic. People living on the roadside already suffer from increased levels of asthma due to the resulting pollution, in addition, affordable housing along the roadside has a high population rate of elderly people with chronic respiratory diseases, there would therefore be a significant risk to their liberty and wellbeing. 3) The section of Wade House Road running along side this land has high stone walls and fences, this results in traffic noise and traffic pollution currently being elevated to such a level that it is very unpleasant to stand at the nearest bus stop. Any additional traffic will render this bus stop unusable. This is the only mode of transport for many of the elderly residents. There is insufficient room for a sheltered bus stop. 4) Access on to Wade House Road at this point will inevitably result in the loss of car parking spaces for the residents along this

stretch of Wade House Road. There is insufficient parking elsewhere to compensate. Many elderly residents rely upon parking outside their houses.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX947**

Site ref (if applicable): **LP1543**

Person ID: **1123990**

Name: **Mrs Katherine Spivey**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX953**

Site ref (if applicable): **LP1543**

Person ID: **368488**

Name: **Mr & Mrs E Archbold**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Highways: I contest that this development will have "No significant impact on the road network" at the local highway network in is already congested with tailbacks the length of the village at peak times. In addition, people travelling from Shelf to Halifax have to struggle through the bottle necks of Stump Cross and Godley Cutting. The roads around this site are unable to accommodate the volume of traffic from a development of this scale, this is backed up in the site assessment, e.g. the "Site appears to have only one possible access (with restricted visibility on Wade House Rd but >300 houses would need more than 1 access)" and there is a "history of complaints on Shelf Moor Road" already. In addition, Cock Hill is a narrow walled country lane, used by walkers & horse riders, and is not suitable for the extra volume of traffic that would be created by this group of developments. Also, Cock Hill has no footpath for pedestrian access. Ecology: The site forms part of a wildlife corridor to the woods in the South ; deer in the woods use the corridor across these fields (i.e. the proposed development areas). Closing or further limiting this wildlife corridor may impact wildlife in the Special Protection Areas & Areas of Conservation within both our & neighbouring districts, for example Shibden Valley & the South Pennine Moors. The site assessment refers to "restoring gaps in the Wildlife Habitat Network" however this may not be possible once it is destroyed so the Wildlife Habitat Network and surrounding Greenbelt should be protected. Building on the Greenbelt near the WHN is contra to the statement in section 3.4 that the "Natural environment and biodiversity will be protected and improved." Historic Environment: Building such a large volume of housing in Shelf will change the special character and have a detrimental impact on the village setting of this area. Restoration of redundant mills in central Halifax would be a better way to provide housing whilst maintaining the cultural heritage and historic architecture of our district. Environmental Health: Building on greenfields on the outskirts of town is not sustainable development. We should be building houses

nearer the jobs and rail links in order to enable a move to a low carbon economy and meet reduction in CO2 targets. Shelf is too far (and too steep a cycle!) from central locations to enable carbon free journeys from home to work. This development on the outskirts of town with no accessible rail links will lead to an increase in the volume of cars on our roads thus having a detrimental impact on greenhouse gas emissions. Rather than building so many new houses the recycling of existing buildings (e.g. empty properties and disused mills) would avoid the carbon footprint of new build. The altitude of the upper areas of Shelf is almost double the lower lying central areas of central Halifax, so the area is more prone to extreme weather & lower temperatures. Hence, new properties built in Shelf will have a negative impact on the environment as heating bills will be higher. The site assessment report has stated that "land drainage issues have been reported in the past" so this site is at risk of flooding. Shelf is a critical drainage area for Halifax; building on these fields will increase run off rates leading to surface water flooding which will lead to an increase in water in lower lying areas. This green space should be retained to assist in natural flood management. According to the vision in the plan, growing food locally will have increased by 2033 whereas the site assessment states this development will lead to a "Loss of agricultural land" The tranquility of Shelf will be compromised by this over development. This will have negative health implications due to: 1) a reduction in critical green space (which is necessary for a strong and healthy society) and 2) environmental pollution caused by an increase in traffic. Other: This site is one of a group of new housing sites in Shelf, which would massively increase the number of houses. This scale of development will drastically change the nature of our communities and local environment, and cause unsustainable pressures on roads and other social infrastructure. Instead the focus of development in Calderdale's Local Plan should be on the regeneration of brownfield sites in sustainable town centres. This amount of development is excessive, and is not in line with projected population growth detailed in the plan. In 2014, it was estimated that population growth till 2033 would be 9.1% this has now reduced to only 4% yet the householder projections included in the plan haven't been updated yet. According to table 2.5, the overall population of residents under 65 will decrease (i.e. 171,800 in 2018 & 165,900 in 2033). So why are 12,600 extra family houses required? It is critical that updated household projections are used to support this plan to ensure that vital Greenbelt land is not allocated for development when in reality (based on updated figures) these homes will no longer be required. The vast majority of the population growth is in the over 75 age group (9300 extra), however this factor does not appear to have been considered in the proposed development sites. This huge development of homes does not meet the strategic priority of responding to the ageing society. Smaller developments building more apartments and sheltered housing would seem to be more appropriate, and ideally these should be spread across the borough to enable ease of travel for families visiting elderly relatives and to enable independent living within the local communities. To aid the health & fitness of the ageing population, it would be ideal if small sport facilities were included in accommodation built for the elderly e.g. swimming pool or gym. These mixed use developments would incorporate job creation & homes for the elderly. I object to the decision to exclude land under 0.25 hectares in size from the development plan as inevitably houses are getting squeezed into every available space. Hence, the likelihood that these brownfield areas will in fact be developed should be factored into the plan. Accessibility: Section 2.33 of the plan refers to Godley Cutting & Stump Cross being congestion hot spots, building in Shelf will exacerbate this issue. According to table 2.2, 64.5% of people living in Calderdale work in Calderdale, so building on the outskirts means these people have further to travel on already congested routes. The journey times specified in the Council site assessment are contested. As Shelf is on the boundary between Bradford & Halifax journey times into either town centre are lengthy, this is exacerbated by the volume of traffic at major junctions (e.g. Stump Cross, Odsal Top etc.). Even in off peak times, the First Group timetabled route from Shelf Village Hall to Halifax is not less than 15 minutes. Journeying from this new development would involve a short walk then bus ride to town so will NOT be achieved in such short timescales (at peak times journeys will be in excess of 30 minutes). Building in Shelf will encourage commuting out of the village and not meet the aspiration of co-location of place of residence & employment and reducing car dependency, whereas building on more central brownfield sites would reduce journey times (reducing greenhouse gas emissions) by enabling people to live nearer the jobs,

rail & public transport links and other facilities. In section 5.10 (policy SD2), the plan states development should be in accessible locations & be accessible safely by different transport modes, e.g. walking. This site isn't within walking distance or safe cycling routes of sufficient employment sites to be sustainable. Hence, cars will be required so this development is not sustainable so is not compliant with national policy. How will this development support the plan to reduce car useage? Also, the topography of Shelf doesn't encourage cycle use whereas development in lower lying or more central areas would be more likely to encourage walking or cycling, which would then meet the strategic priority of increasing healthy lifestyles. Greenbelt: Building on the Greenbelt is not justified so this development doesn't meet the Test of Soundness. Before destroying the Greenbelt all possible alternatives should be fully exhausted, e.g. use of smaller Brownfield sites. According to section 6.52 of the plan "Whilst preferential to develop Brownfield sites first, the potential available land does not provide sufficient opportunities for growth in jobs" this is also applicable to this Greenbelt land. Consideration should be given to working with neighbouring local authorities, e.g. a large proportion of people living in Calderdale work in Bradford if housing development was built near the new Low Moor train station this would enable people to live nearer to work and travel sustainably. Building on the Greenbelt is not sustainable so this is not consistent with national policy. We should be living within the planets environmental limits and looking to maximise useage of existing housing stock and Brownfield sites. One of the sustainability objectives is to "Enhance viability and vitality of town centres" this is not met by the failure to develop & regenerate derelict properties & other urban land in more central areas. Consideration should be given on how we can incentivise/enforce regulations so that property owners develop their empty properties. Building on greenbelt land discourages development of the smaller central brownfield sites which are within walking distance or short bus ride of town centre locations; development of brownfield sites would encourage use of our own town centre facilities. Agricultural land is an increasingly important commodity which should be protected. The purpose of the greenbelt is to provide a safeguard to the countryside from the encroachment of over development, the greenbelt must be protected to ensure we meet the plan to protect Calderdale's environment and preserve and enhance the natural landscape. Development of this area will result in "complete loss of amenity or recreation value. " This site together with adjacent sites maintain s a strong, distinct gap between Shelf and the Bradford built-up area; it fulfils at least four maybe five of the purposes of Greenbelt established by NPPF: "to check the unrestricted sprawl of large built-up areas', "to prevent neighbouring towns merging into one another' , "to assist in safeguarding the countryside from encroachment' and 'to assist in urban regeneration , by encouraging the recycling of derelict and other urban land'. Land should NOT be removed from the Greenbelt without exceptional circumstances, no such circumstances have been evidenced. Removing this land from Greenbelt is in contravention of the plans aim that the Natural environment and biodiversity of Calderdale will be protected and improved. Additional Comments: I propose that the land remain as Green Belt.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Keep this land is Greenbelt & remove this development from the plan.

Additional Evidence Link:

Comment ID **APX97**

Site ref (if applicable): **LP1543**

Person ID: **1066927**

Name: **Mrs Sally Bulgacs**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation/Ecology Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so

compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the "development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network" This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as "less than 15mins" Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX988**

Site ref (if applicable): **LP1543**

Person ID: **1183641**

Name: **Mrs Caroline Whelan**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation/Ecology Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **APX989**

Site ref (if applicable): **Lp1543**

Person ID: **1183625**

Name: **Mrs Julie Smith**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION/ECOLOGY Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **Lpp1078**

Site ref (if applicable): **LP1543**

Person ID: **977466** Name: **Mr & Mrs Jean & Steven Sanderson** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

See attachment

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5081691>

Comment ID **Lpp1393**

Site ref (if applicable): **LP1543**

Person ID: **1183599** Name: **Mr Andrew Wood** Organisation: **Consultant Planner CPRE**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

See attachment for context of comments. Introductory paragraph of Evidence Paper 2 states that: Please note that it was our intention to divide up this document and submit it in relevant sections using the representation form, but having downloaded the form we found that key entry fields were locked. Given that the representation system is in any case not well-suited to comments that develop a narrative and contain figures and tables, we have therefore reverted to submitting full documents. These are structured as carefully as possible to enable you to use them. It is our view that the Publication Draft is not positively prepared to deliver sustainable development. It is not justified by the most appropriate and up-to-date evidence of development needs. And it will not be effective in delivering sustainable development, due to fundamental internal contradictions between the scale and distribution of development and other key policies in the Plan. This evidence paper explains our position on these points, and we conclude that very substantial modifications will be needed to make the Plan sound. Policy SD7 Housing sites: site specific housing objection LP0782 and LP1543 Cock Hill Lane and Wade House Road, Shelf Poor public transport

accessibility, cumulative highways congestion impacts, heritage impacts. Results in disproportionate growth of Shelf relative to settlement hierarchy. Consequently the Green Belt release and subsequent allocation would enable an unsustainable pattern of development.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5122736><http://calderdale-consult.objective.co.uk/file/5102830>

Comment ID **Lpp214**

Site ref (if applicable): **LP1543**

Person ID: **514242**

Name: **Mrs Barbara Tempest**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

The main road through Shelf is already heavily congested with standing traffic through the village at peak times. There are no plans to improve the infrastructure with drainage and sewerage a prime concern, alongside doctors and school provision. The bus service is poor, with buses scheduled at two per hour at peak times reducing to one per hour after 6 pm. The proposed development is on green belt land and will heavily overpopulate country lanes which access Halifax Road and Denholme Gate Road ; these are already used constantly as short cuts from Queensbury, Wibsey and surrounding areas in an attempt to avoid the congestion on the main roads.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **Lpp502**

Site ref (if applicable): **LP1543**

Person ID: **1110001**

Name: **Councillor Peter Caffrey**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

This site in Wade House Road Shelf has a residential capacity of 330 units. It is immediately next to site no LP0782 in Cock Hill Lane, Shelf which has a potential capacity of 175 units. Both sites are in the green belt. The collective development on the cusp of this village is therefore over 500 units in one location. This is extremely dense and overbearing in a rural area with limited infrastructure. A sounder alternative would be to remove one of these sites and replace it with sites number LP1034 and LP1035 which, although also green belt and both in Shelf, would spread the density and see development of an area which is substantially less ambient than the Cock Hill Lane site.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **Lpp504**

Site ref (if applicable): **LP1543**

Person ID: **1110001** Name: **Councillor Peter Caffrey** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

This site in Wade House Road Shelf has a residential capacity of 330 units. It is immediately next to site no LP0782 in Cock Hill Lane, Shelf which has a potential capacity of 175 units. Both sites are in the green belt. The collective development on the cusp of this village is therefore over 500 units in one location. This is extremely dense and overbearing in a rural area with limited infrastructure. A sounder alternative would be to remove one of these sites and replace it with sites number LP1034 and LP1035 which, although also green belt and both in Shelf, would spread the density and see development of an area which is substantially less ambient than the Cock Hill Lane site.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **Lpp54**

Site ref (if applicable): **LP1543**

Person ID: **1171108** Name: **Mr Brian Crossley (SNLPP)** Organisation: **Chairperson SNLPP**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

This comment is a duplicate of the comment made against this site under Appendix 1, Site Allocations - Supporting Information, as it is not clear which section of the Local Plan should be used. Greenbelt We accept that the site already scores as 'high sensitivity' in the Greenbelt Review 2016, scoring 3 out of the five purposes of Greenbelt, and that a positive scoring on further purposes will not change that. However, we feel we must comment on the inconsistent and entirely subjective assessment results which have concluded that the site does not fulfil Purpose I "" 'To check the unrestricted sprawl of large built up areas'. Considering Purpose I, Q3 - 'Is there a robust permanent Greenbelt/Development boundary?' A comparison with the adjacent site LP0782 shows that it shares a boundary, has identical boundary treatments and has been correctly given a YES in answer to this question. It is inconsistent and illogical to answer NO for LP1543. Considering Purpose I, Q7 - 'Would development of the site create an irregular settlement pattern?' Development of the site would leave a narrow strip of Greenbelt/Open Space on the Eastern edge only meters wide in places. The northern and western edges are bounded by farmland so the site would only be connected to Shelf on the southern boundary thereby creating a bulge in the settlement boundary of Shelf. The only consistent and logical answer to Q7 must therefore be YES. With positive answers to Q3 and Q7 the only possible conclusion therefore is that the site fulfils Purpose I. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. The Local Plan Technical Paper: 'Exceptional circumstances for the release of Green Belt' states that the Plan utilises the emerging National Policy in its approach to exceptional circumstances. Para. 136 of the emerging National Policy states: Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic plan-making authority should have examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of the plan, which will take into account the preceding paragraph, and whether the strategy: makes as much use as possible of suitable brownfield sites and underutilised land; It is difficult to see how there may be exceptional circumstances in favour of development when there are numerous small, underutilised sites in urban areas that have been omitted simply on the grounds of their area. A 'full examination of all reasonable options' should, by definition, have included them. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. The site is on the northern most fringe of Shelf. We refer to ' Report no 70018699-02 - Calderdale Local Plan Transport Evidence, Technical Note 1: Future Network Baseline Dated June 2016', which shows that it is outside the 400m buffer zone of proximity to a high frequency bus service. We also refer to the Calderdale Core Transport Strategy Study "" 'Appraising the Approaches to Future Development' by Stear, Davies, Gleave dated January 2010, extracts from which are given below, of particular note are the comments contained in paras 5.8.1 and 5.8.3 We submit that, distant as it is from access to public transport and other services this site CANNOT be considered to be sustainable and

therefore the proposal is non-compliant with current National Policy. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide, as shown on our attached photo (see plate LP1543-1 attached). Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses, notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume (see also assessment and comments for LP0782). Linking LP1543 and LP0782 has the potential for 495 houses but Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to point out that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic interacting with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to share Cockhill Lane with the fast-moving traffic but without the benefit of a footway for their safe passage. It is claimed that traffic impact for LP1543 and LP0782 (by linking) is being considered at a strategic level but Highways DM have failed to show any detail of, or seemingly to even consider, the cumulative impact of these sites on the Local Highway Network (LHN). Any proposed interventions must explain in detail the interaction between the new highway network within the sites, and its connections with the local highway network immediately around them (and then the strategic highway network beyond). Proposals for site access are unrealistic and the cumulative impact on the local highway network has not been assessed. Judgements about the capacity of the LHN are unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. We can see some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made, it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation/Ecology Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Sun Wood/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. In our opinion, the remaining strip of WHN would be so compromised by recreational disturbance from this development that it would cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. Policy GN1 - Securing green infrastructure provision states (extract): 'The Council will put mechanisms in place to secure Green Infrastructure provision in the Borough. To achieve this, the primary focus will be on: Improving and enhancing existing Green Infrastructure assets, and/or expanding existing, or creating new, Green Infrastructure assets; Encouraging the protection, enhancement and creation of Green Infrastructure through the Development Management System; New development must be served by Green

Infrastructure to meet the needs of the prospective residents in a manner which will contribute to the creation of a high-quality environment and provide access to high quality open space for leisure and recreational purposes. Development proposals should ensure that: The Green Infrastructure function of the land is retained and where possible improved; The opportunity is taken to extend and increase Green Infrastructure by linking green spaces, filling in gaps in Green Infrastructure provision, and/or increasing Species and Habitats of Principal Importance.' The proposal for development on LP1543 is not compliant with policy GN1. Policy GN2 - A joined up green infrastructure network states (extract): 'The Council will ensure that the Green Infrastructure network is joined up. Existing spaces should be interlinked allowing biodiversity and humans safe access to, and transit between, a range of valued spaces. To achieve this, decisions upon development proposals shall have particular regard to: Maintaining critical biodiversity assets and providing long term security for these as identified in the Calderdale Biodiversity Action Plan; The proposal for development on LP1543 is not compliant with policy GN2. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved species rich grassland but it is not defined how or where this may be created in the local area. The mitigation measures should be fully identified and stated BEFORE release of this site from Greenbelt as failure to define it at this stage may mean that, when a planning application is submitted, the site cannot actually be developed due to a lack of suitable mitigation sites. Policy GN3 "" Natural Environment states (extract): 'Development proposals which are likely to have a significant adverse impact on a site with one or more of the following designations, habitats or species will not be permitted except in exceptional circumstances where the reasons for the proposed development clearly outweigh the value of the ecological feature adversely affected and there are no appropriate alternatives: ii Local Wildlife Sites (LWS); iii Calderdale Wildlife Habitat Network (or similar designation); iv Priority habitats and species within the Calderdale Biodiversity Action Plan;' No exceptional circumstances have been put forward and there are many appropriate alternatives therefore the proposal for development is not compliant with policy GN3. Policies GN1, GN2 and GN3 all state, as one of their targets: 'Increase the Borough's woodland cover each year to 2031 (amount to be determined);' We submit that the proposal for development of LP1543 is contrary to the stated aims and targets of GN1, GN2 and GN3. The site assessment suggests that an Ornithological Survey may be required and that the 'development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network' . We would go further and suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. The Local Plan must also identify positively where 'locally native species rich unimproved grassland and hedgerows' may be provided as mitigation in the local area. Additionally, it is counter productive that development must restore a gap in the WHN when it is the very development that is creating such a gap. Given that the site is Greenbelt and requires exceptional circumstances to justify its removal from the Greenbelt, a habitat and species assessment should be carried out BEFORE allocation. A Protected Species Report has not been called for in the site assessment but failure to take account of this at this stage may mean that, when a Planning Application is submitted, even though the site is allocated for development in the Local Plan, the presence of species in a UK or Calderdale BAP may mean that the site cannot actually be developed or the anticipated quantum of development is undeliverable. Accessibility We agree with the 'Distance to Bus Stop' of between 400m and 2km. However, we disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as 'less than 15mins'. Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Since journey times and distances for several other Accessibility categories involve bus

journeys and walking to the bus stop then they must also now be regarded as seriously flawed. Notwithstanding our comments above, we fail to see how journey times or distances stated on the Site Assessment can be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. Sustainability The Sustainability Assessment scores only 4 'positive' outcomes out of 17 with 12 outcomes being 'uncertain'. However, the Accessibility RAG scoring has been used to justify the positive outcomes on two of the objectives; SA 3 "" 'To create and retain healthy vibrant and inclusive communities' and SA5 "" 'To improve accessibility to essential services, facilities and employment'. Referring to our comments above on Accessibility, we believe that the RAG scoring is seriously flawed and thereby calls into question the 'positive' outcomes for SA3 and SA5. This begs the question, if only two (or at most four) of the 17 objectives are positive, how can the site be regarded as sustainable. Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents of this site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other parts of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the list of allocations until ALL underutilised sites (including those below 0.25ha) have been FULLY considered for allocation.

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5052368>

Comment ID **Lpp564**

Site ref (if applicable): **LP1543**

Person ID: **1183442**

Name: **Mr Daniel Cook**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply

on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION/ECOLOGY Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the 'development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network'. This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as 'less than 15mins'. Referring to the

WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Additional Evidence Link:

Comment ID **Lpp677**

Site ref (if applicable): **LP1543**

Person ID: **1183537**

Name: **Mr Derek Heap**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments as to why I consider the Local Plan is unsound Greenbelt The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated

for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. Highways Development Management Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. Conservation/Ecology Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the 'development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network'. This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN.

Accessibility I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as 'less than 15mins'. Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. Sustainability The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Additional Evidence Link:

Comment ID **Lpp705**

Site ref (if applicable): **LP1543**

Person ID: **1094062**

Name: **Miss Helga Oates**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

The roads in both Shelf and Northowram already experience heavy congestion, with long delays being experienced throughout the day on the mainroads (A6036 and A644). The proposed sites are presently accessed via narrow lanes which will not support additional traffic, construction or future residential. More traffic will be generated by new residents need of essential day to day items as the village of Shelf

has limited local shops, namely one butchers and one chemist (the bakery is a sandwich shop with limited opening hours mid week), and additionally an Esso garage at Stone Chair and a Lidl on the Bradford border. Sites LP0782 and LP1543 are a distance from all of these and as parking is an issue I would envisage the majority driving to a local town for milk, bread & a newspaper. Sites LP0782 and LP1543 are on the hill side above the existing housing, this area is colder and suffers from stronger winds than the lower lying areas of Calderdale. Properties will burn more fuel in order for inhabitants to keep warm thus increased pollution at a time when we are meant to reduce greenhouse gases.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Remove Sites LP0782 and LP1543 from plan

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5062206>

Comment ID **Lpp711**

Site ref (if applicable): **LP1543**

Person ID: **368488**

Name: **Mr & Mrs E Archbold**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Highways: I contest that this development will have 'No significant impact on the road network', the local highway network in is already congested with tailbacks the length of the village at peak times. In addition, people travelling from Shelf to Halifax have to struggle through the bottle necks of Stump Cross and Godley Cutting. The roads around this site are unable to accommodate the volume of traffic from a development of this scale, this is backed up in the site assessment, e.g. the 'Site appears to have only one possible access (with restricted visibility on Wade House Rd but >300 houses would need more than 1 access)' and there is a 'history of complaints on Shelf Moor Road' already. In addition, Cock Hill is a narrow walled country lane, used by walkers & horse riders, and is not suitable for the extra volume of traffic that would be created by this group of developments. Also, Cock Hill has no footpath for pedestrian access. Ecology: The site forms part of a wildlife corridor to the woods in the South; deer in the woods use the corridor across these fields (i.e. the proposed development areas). Closing or further limiting this wildlife corridor may impact wildlife in the Special Protection Areas & Areas of Conservation within both our & neighbouring districts, for example Shibden Valley & the South Pennine Moors. The site assessment refers to 'restoring gaps in the Wildlife Habitat Network', however this may not be possible once it is destroyed so the Wildlife Habitat Network and surrounding Greenbelt should be protected. Building on the Greenbelt near the WHN is contra to the statement in section 3.4 that the 'Natural environment and biodiversity will be protected and improved.' Historic Environment: Building such a large volume of housing in Shelf will change the special character and have a detrimental impact on the village setting of this area. Restoration of redundant mills in central Halifax would be a better way to provide housing whilst maintaining the cultural heritage and

historic architecture of our district. Environmental Health: Building on greenfields on the outskirts of town is not sustainable development. We should be building houses nearer the jobs and rail links in order to enable a move to a low carbon economy and meet reduction in CO2 targets. Shelf is too far (and too steep a cycle!) from central locations to enable carbon free journeys from home to work. This development on the outskirts of town with no accessible rail links will lead to an increase in the volume of cars on our roads thus having a detrimental impact on greenhouse gas emissions. Rather than building so many new houses the recycling of existing buildings (e.g. empty properties and disused mills) would avoid the carbon footprint of new build. The altitude of the upper areas of Shelf is almost double the lower lying central areas of central Halifax, so the area is more prone to extreme weather & lower temperatures. Hence, new properties built in Shelf will have a negative impact on the environment as heating bills will be higher. The site assessment report has stated that 'land drainage issues have been reported in the past' so this site is at risk of flooding. Shelf is a critical drainage area for Halifax; building on these fields will increase run off rates leading to surface water flooding which will lead to an increase in water in lower lying areas. This green space should be retained to assist in natural flood management. According to the vision in the plan, growing food locally will have increased by 2033 whereas the site assessment states this development will lead to a 'Loss of agricultural land'. The tranquility of Shelf will be compromised by this over development. This will have negative health implications due to: 1) a reduction in critical green space (which is necessary for a strong and healthy society) and 2) environmental pollution caused by an increase in traffic. Other: This site is one of a group of new housing sites in Shelf, which would massively increase the number of houses. This scale of development will drastically change the nature of our communities and local environment, and cause unsustainable pressures on roads and other social infrastructure. Instead the focus of development in Calderdale's Local Plan should be on the regeneration of brownfield sites in sustainable town centres. This amount of development is excessive, and is not in line with projected population growth detailed in the plan. In 2014, it was estimated that population growth till 2033 would be 9.1% this has now reduced to only 4% yet the householder projections included in the plan haven't been updated yet. According to table 2.5, the overall population of residents under 65 will decrease (i.e. 171,800 in 2018 & 165,900 in 2033). So why are 12,600 extra family houses required? It is critical that updated household projections are used to support this plan to ensure that vital Greenbelt land is not allocated for development when in reality (based on updated figures) these homes will no longer be required. The vast majority of the population growth is in the over 75 age group (9300 extra), however this factor does not appear to have been considered in the proposed development sites. This huge development of homes does not meet the strategic priority of responding to the ageing society. Smaller developments building more apartments and sheltered housing would seem to be more appropriate, and ideally these should be spread across the borough to enable ease of travel for families visiting elderly relatives and to enable independent living within the local communities. To aid the health & fitness of the aging population, it would be ideal if small sport facilities were included in accommodation built for the elderly e.g. swimming pool or gym. These mixed use developments would incorporate job creation & homes for the elderly. I object to the decision to exclude land under 0.25 hectares in size from the development plan as inevitably houses are getting squeezed into every available space. Hence, the likelihood that these brownfield areas will in fact be developed should be factored into the plan. Accessibility: Section 2.33 of the plan refers to Godley Cutting & Stump Cross being congestion hot spots, building in Shelf will exacerbate this issue. According to table 2.2, 64.5% of people living in Calderdale work in Calderdale, so building on the outskirts means these people have further to travel on already congested routes. The journey times specified in the Council site assessment are contested. As Shelf is on the boundary between Bradford & Halifax journey times into either town centre are lengthy, this is exacerbated by the volume of traffic at major junctions (e.g. Stump Cross, Odsal Top etc.). Even in off peak times, the First Group timetabled route from Shelf Village Hall to Halifax is not less than 15 minutes. Journeying from this new development would involve a short walk then bus ride to town so will NOT be achieved in such short timescales (at peak times journeys will be in excess of 30 minutes). Building in Shelf will encourage commuting out of the village and not meet the aspiration of co-location of place of residence & employment and reducing car dependency ,

whereas building on more central brownfield sites would reduce journey times (reducing greenhouse gas emissions) by enabling people to live nearer the jobs, rail & public transport links and other facilities. In section 5.10 (policy SD2), the plan states development should be in accessible locations & be accessible safely by different transport modes, e.g. walking. This site isn't within walking distance or safe cycling routes of sufficient employment sites to be sustainable. Hence, cars will be required so this development is not sustainable so is not compliant with national policy. How will this development support the plan to reduce car usage? Also, the topography of Shelf doesn't encourage cycle use whereas development in lower lying or more central areas would be more likely to encourage walking or cycling, which would then meet the strategic priority of increasing healthy lifestyles. Greenbelt: Building on the Greenbelt is not justified so this development doesn't meet the Test of Soundness. Before destroying the Greenbelt all possible alternatives should be fully exhausted, e.g. use of smaller Brownfield sites. According to section 6.52 of the plan 'Whilst preferential to develop Brownfield sites first, the potential available land does not provide sufficient opportunities for growth in jobs', this is also applicable to this Greenbelt land. Consideration should be given to working with neighbouring local authorities, e.g. a large proportion of people living in Calderdale work in Bradford if housing development was built near the new Low Moor train station this would enable people to live nearer to work and travel sustainably. Building on the Greenbelt is not sustainable so this is not consistent with national policy. We should be living within the planet's environmental limits and looking to maximise use of existing housing stock and Brownfield sites. One of the sustainability objectives is to 'Enhance viability and vitality of town centres', this is not met by the failure to develop & regenerate derelict properties & other urban land in more central areas. Consideration should be given on how we can incentivise/enforce regulations so that property owners develop their empty properties. Building on greenbelt land discourages development of the smaller central brownfield sites which are within walking distance or short bus ride of town centre locations; development of brownfield sites would encourage use of our own town centre facilities. Agricultural land is an increasingly important commodity which should be protected. The purpose of the greenbelt is to provide a safeguard to the countryside from the encroachment of over development, the greenbelt must be protected to ensure we meet the plan to protect Calderdale's environment and preserve and enhance the natural landscape. Development of this area will result in 'complete loss of amenity or recreation value.' This site together with adjacent sites maintains a strong, distinct gap between Shelf and the Bradford built-up area; it fulfills at least four maybe five of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', 'to prevent neighbouring towns merging into one another', 'to assist in safeguarding the countryside from encroachment' and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. Land should NOT be removed from the Greenbelt without exceptional circumstances, no such circumstances have been evidenced. Removing this land from Greenbelt is in contravention of the plan's aim that the natural environment and biodiversity of Calderdale will be protected and improved. Additional Comments: I propose that the land remain as Green Belt.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

I propose that the land LP 1543 remain as Green Belt.

Additional Evidence Link:

Comment ID **Lpp83**

Site ref (if applicable): **LP1543**

Person ID: **1093075**

Name: **Mrs Alison Cooper**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREENBELT The Site Assessment acknowledges that this site performs strongly against the five purposes of Greenbelt, fulfilling three of the five purposes. I agree that it does not fulfil Purpose IV but a sense check for Purpose 1 shows that the site is identical in nature and boundary treatment to LP0782, to which it is linked. As LP0782 fulfils Purpose I then this site must also fulfil Purpose I. As a site that fulfils FOUR OF THE FIVE purposes, this site should not be removed from the Greenbelt. NPPF para 83 requires that 'exceptional circumstances' are demonstrated for land to be taken out of the Greenbelt but no such circumstances have been put forward. It is difficult to see how there may be exceptional circumstances in favour of development when there are dozens of small sites in urban areas that have been omitted simply on the grounds of their plot size. NPPF para 84 requires a review of Greenbelt boundaries to take account of the need to promote sustainable development. Distant as it is from access to normal services this site is NOT sustainable and therefore the proposal is non-compliant. HIGHWAYS DEVELOPMENT MANAGEMENT Highways DM acknowledge that there is only one possible point of access to the site i.e. on Wade House Rd (A6036) and this has restricted visibility, this statement greatly understates the situation. In fact, the access is a narrow gap between terraced houses that is little more than two field gates wide as a simple site visit will show. Highways DM allude to a possible access point in the North but there are no details given so it is not possible to make a reasoned comment on it. It seems that this access would be onto South lane which again Highways DM have said is not capable of taking the volume of traffic generated by 330 houses. Notwithstanding the fact that proposed site LP0782 (165 houses) would also be linked, adding further traffic volume. Linking LP1543 and LP0782 has the potential for 495 houses and Highways DM have stated (in separate assessments) that the access points on both sites would not be able to cope with the increased traffic, yet they seem unwilling or unable to admit that development of these sites is unsustainable. Accessing the site through LP0782 will put increased traffic onto Cockhill Lane. This is a narrow country lane between dry stone walls with NO FOOTWAY for its entire length except a short section on one side near the junction with West Street. The lane is narrow, steep in places with blind bends at the narrowest, steepest parts. On the steep, blind bends it is reduced to single track due to necessarily parked cars. It has a 60mph speed limit and widely spaced street lighting consistent with non-urban lighting. It is totally unsuitable for increased volumes of traffic sharing space with the various classes of pedestrians. Pedestrians accessing the nearest junior school or public bus stop would have to use Cockhill Lane as well as the fast-moving traffic but without the benefit of a footway for their safe passage. There are some common features in the assessments of LP1543 and 0782 (either singly or linked together). Most notably that proposals for site access are very often unrealistic or very difficult, and then that the cumulative impact on the local highway network has either not been assessed, or where a judgement about the capacity of the LHN has been made it is unrealistic when considering such factors as the narrowness of individual roads, absence of pavements, difficult junctions etc. CONSERVATION/ECOLOGY Approximately 70% of the site consists of Wildlife Habitat Network/ Wildlife Corridor and is the last link between Wood Fall/North Wood to the south and the wider greenbelt to the north. It is therefore an important Green Infrastructure Asset for Shelf, something that the Local Plan claims to promote through its various GI policies but shows little evidence of support for on the ground. Development will destroy all but a very narrow strip of the corridor a matter of a few meters wide. However, this strip is already closed off at the north end by residential development, thus an 'island' of WHN surrounded entirely by development, would

be created. Whilst Conservation (Ecology) have suggested some small mitigation measures they are woefully inadequate given the extent of the proposed loss. The remaining strip of WHN will be so compromised by recreational disturbance from this development that it will cease to operate as an effective area for wildlife or biodiversity. The Wildlife Corridor/WHN in and around Shelf has become fragmented and development proposals in the Local Plan are set to increase that fragmentation. Conservation have failed to show whether the cumulative impact of this loss has been assessed or show any results of such an assessment. The site consists of semi-improved grassland currently used for grazing and hay production. The site assessment calls for mitigation in the form of the creation of areas of unimproved, species rich grassland and hedgerows but the Plan does not say how and where this will be created in the local area. You cannot simply expect wildlife to accommodate development by moving to another field when their habitat is destroyed. Why try to re-create (perhaps unsuccessfully) habitat elsewhere when we have a perfectly acceptable one on this site that has existed for generations. The site assessment suggests that an Ornithological Survey may be required and that the 'development should ensure the provision of locally native species rich unimproved grassland, restoring gaps in the Wildlife Habitat Network'. This falls far short of what is required, I suggest that a full species survey is required to identify the range of flora and fauna present in this area of WHN. ACCESSIBILITY I agree with the 'Distance to Bus Stop' of between 400m and 2km. However, I disagree with several of the RAG scorings for journey times, most notably 'Journey time to Town Centre' which is shown as 'less than 15mins'. Referring to the WYMETRO 'Journey Planner' software this gives a total journey time to town centre of 40mins at a.m. peak time Mon to Fri. far greater than the 'less than 15mins' journey stated in the Accessibility RAG scores. The total journey time increases to 41mins during a.m. off-peak when you might expect elderly or non-working people to travel. Similarly, the 'Distance to Primary School' RAG scoring of 'less than 15mins' is incorrect. The nearest Primary School is Shelf J&I. Although there are no public bus services from the site to the school, the shortest route will still pass the nearest bus stop on Wade House Road. The school is a further 500m from the bus stop giving a walking distance of up to 2.5km. A more realistic journey time will be about 40mins. Notwithstanding the comments above, how can journey times or distances stated on the Site Assessment be relied upon when Highways DM have not determined where and how many points of access there will be to the site. Location of access points will obviously make a great deal of difference when deciding if it is time efficient OR EVEN SAFE to walk to school or a bus stop. SUSTAINABILITY The Sustainability Assessment only scores 4 'positive' outcomes out of 17 but two of these positive results are based on the seriously flawed Accessibility scores so must be disregarded (see my Accessibility comments above). How can the site be regarded as sustainable when it has only 2 positive scores out of a possible 17? Open space When considering the loss of open space, it is seriously flawed to consider that loss of the site will be felt only by residents adjacent to the site. Of course, there may be other open space within the catchment of this site to act as compensation. What the assessment fails to realise is that the site itself forms part of the catchment of other areas of Shelf, it is those areas that are losing access to open space. Can the council not see that, as the settlement boundary expands then open space grows ever more distant from existing housing.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link:

Comment ID **Lpp857**

Site ref (if applicable): **LP1543**

Person ID: **10988**

Name: **Mr Anthony Rae**

Organisation: **Coordinator Calderdale
Friends of the Earth**

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

In the case of this site we've noted the following comments in the detailed assessment, which reference a variety of issues about traffic/road/junction loadings, and site access. They need to be read in conjunction with the assessment for site LP0782. We've personally inspected the site and its adjacent LHN to ensure an understanding of its context, and as part of our assessment of the LHN capacity at this location: Local highways issues: - Large infill site north west of Wade House Rd. Site appears to have only one possible access (with restricted visibility on Wade House Rd but >300 houses would need more than 1 access. - No second point of vehicular access based on site boundary, without third party land. - There is a history of complaints on Shelf Moor Road along its entirety from Shelf to the Brighouse and Denholme Gate Road at Queensbury. The road is a well used cut through between those 2 areas and is subject to a prohibition of through movement of Goods Vehicles exceeding 7.5t (although this is abused). Hence the rather severe traffic calming to slow the speed of vehicles approaching the pinch point as Shelf Moor Road becomes South Lane. Given that pinch point which restricts vehicles to one direction at a time I do not consider the road could accommodate much more traffic, certainly not the full site. Possibly 50 to 100 but would need to examine existing flows to determine acceptable limit. Cock Hill Lane could provide a link through to the adjacent site but couldn't accommodate traffic from the whole site - 330 dwellings. This is because of the impact on West Street and Cross Lane to the south. Summary of highways and access: - The Highways Development Management Section has raised concerns regarding the potential for increased congestion on the local road network. As such a Transport Assessment would be required to assess the impact of additional traffic. - In terms of site access, considering the scale of the site, concerns were raised with access being provided from a single point on Wade House Road. ... A plan was subsequently submitted showing potential accesses from Shelf Moor Road / South Lane and through adjacent site LP0782. In response the Highways Development Management Section has commented that given the pinch point that exists as Shelf Moor Road becomes South Lane the road could not accommodate the entire site capacity. In addition however, subject to third party land permission, Cock Hill Lane could provide a link to the site through site LP0782, but again not the entire site capacity. Please also note that the coverage of the Calderdale strategic transport model does not extend to include the local highway network affected by this site allocation, meaning that it is not possible for consultees to make a quantified assessment of its impact - see the attached screenshot.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5074076>

Main Issues and Council Response

Legal Compliance

Main Issues:

1. Neighbouring notification - Lack of notification of proposal and Local Plan process.

Council's Response:

1. Extensive and inclusive consultation has been carried out throughout all stages of the Local Plan preparation process in accordance with the Council's adopted Statement of Community Involvement and is detailed in the Consultation Statement (Regulation 22).

Test of Soundness

Main Issues:

1. Green Belt - Loss of Green Belt. Lack of exceptional circumstances. Green Belt Assessment is incorrect. Utilise non Green Belt sites first.
2. Local Road Network - Inadequate local road network, specifically capacity, congestion, road safety issues, on-street parking and lack of consideration of cumulative effects.
3. Site Access - Proposals for site access are unrealistic/lack detail.
4. Infrastructure - Lack of/pressure on existing amenities, services and facilities in the local area, e.g. schools, shops, doctors.
5. Ecology - Impact on wildlife including Wildlife Habitat Network and Protected Species. Suggested mitigation measures are inadequate and lack detail. No consideration of cumulative impacts. A full species survey should be undertaken. Preliminary Ecological Appraisal and Protected Species Survey required as well as a Construction Environmental Management Plan and an Ecological Management Plan. Development of the site would conflict with Green Infrastructure policies.
6. Accessibility - Journey times are significantly underestimated.
7. Sustainability Appraisal - The results of the SA are based on flawed accessibility scores.
8. Open Space - Loss of open space. Capacity of other open spaces. Impact on health and wellbeing.
9. Heritage - Listed Buildings in proximity (3-7 Cockhill Lane). Development will erode local heritage.
10. Flooding – building on greenfield sites will increase run off and surface water flooding.
11. Air Quality - Impact of development on air pollution.
12. Drainage – Site has poor drainage and development will exacerbate this.
13. Land Stability - Mine shafts on the site.
14. Housing need - Level of housing growth not in line with projected population growth.

15. Demographics - Meeting needs arising from increase in older age groups not considered in allocation of site.

16. Site Distribution - Cumulative impact with other housing sites in the locality (particularly LP0782) and unsustainable pattern of development.

Council's Response:

1. Document EV 09 Exceptional Circumstances for the Release of Green Belt (2018) considers the process that the Council has followed in relation to the potential need to release land from the Green Belt. It can be seen that a methodical approach has been built into each stage of the process and that ultimately this process has dovetailed with the Government's emerging policy on exceptional circumstances.

The proposed changes to the Calderdale Green Belt are clearly a last resort and have been minimised. Furthermore, the boundary changes are essential to achieving a sustainable future for Calderdale – one that reconciles economic, social and environmental sustainability.

With regards to the site assessment process, in order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area, only using the most sensitive Green Belt when all alternative sites were used.

It is considered that the exceptional circumstances have been demonstrated to justify the proposed changes to the Calderdale Green Belt boundary.

2. The Highways Development Management Section has raised concerns regarding the potential for increased congestion on the local road network. As such a Transport Assessment would be required to assess the impact of additional traffic.

3. In terms of site access, considering the scale of the site, concerns were raised with access being provided from a single point on Wade House Road. A plan was subsequently submitted showing potential accesses from Shelf Moor Road / South Lane and through adjacent site LP0782. In response the Highways Development Management Section has commented that given the pinch point that exists as Shelf Moor Road becomes South Lane the road could not accommodate the entire site capacity. In addition however, subject to third party land permission, Cock Hill Lane could provide a link to the site through site LP0782, but again not the entire site capacity. As such, should the necessary third party land agreements be confirmed (negotiations underway), access to the site would be possible, with careful masterplanning that may involve the subdivision of the site.

4. The Infrastructure Delivery Plan is a compendium of projected infrastructure provision and it helps to ensure that this infrastructure is provided in a timely manner and in a coordinated and sustainable way. It sets out the infrastructure that will support the level of development that is proposed in the Calderdale Local Plan.

5. In terms of ecology, the land consists of semi-improved grassland, hedgerows and scattered shrubs, it also borders the Wildlife Habitat Network on its north eastern boundary. The Conservation Section (Ecology) has indicated that development would be acceptable subject to various mitigation measures, including the undertaking of an ornithological survey and biodiversity enhancement providing locally native species rich unimproved grassland and locally native species rich hedgerows, restoring the gaps in the Wildlife Habitat Network. Recommendations have also been made with regard to the provision of SuDS that will also be carried forward as site specific considerations.

6. Accessibility modelling has been undertaken by West Yorkshire Combined Authority which takes into account the most recent integrated transport networks and public transport timetables. The methodology used for assessing accessibility is within the appendices of the Site Assessment Methodology document.

7. The SA is part of the Local Plan preparation process and its purpose is to inform the development of the plan; it is not the sole contributor to proposing or rejecting site allocations. The methodology for assessing the impacts was part of the SA Framework that has been developed over a number of years. The SA Framework has been subject to a number of public consultations.

8. The site is currently designated as greenbelt and used for agriculture but part of the site also performs the function of a natural/semi-natural open space. An assessment of open space in the area shows that there are sufficient alternative natural/semi-natural areas within the 400m and 1200m catchment of this site to meet the adopted standards and that there are other greenbelt sites performing this function within the 600m catchment. However if the site is designated for housing, open space would be required as part of any development since there are deficiencies in other typologies. Although the site may be used informally for recreation this cannot be safeguarded since it is private land and it is not designated as open space. Any development should consider the footpaths which run along the western and southern boundaries of the site. The visual impact of any development should be considered.

9. An assessment has been carried out to examine the impact of development on any designated and non-designated heritage assets in the locality. The assessment has concluded that development is unlikely to result in harm to any heritage assets. West Yorkshire Archaeology Advisory Service has however noted that the land includes site PRN11675 and have therefore recommended an archaeological desk-based assessment in the first instance.

10. The site lies in Flood Zone 1. However, given the size and greenfield status of the site, a Flood Risk Assessment would be required in order to assess any risk of flooding and propose mitigation measures to reduce such risks. The Council's Flooding and Drainage Section has commented that several past drainage issues have been reported in the surrounding area and actions in place to resolve these. They have indicated that the site is suitable for development after a Hydrological Assessment of Wood Fall Beck and surface water assessment is carried out. Mitigation measures have been suggested in the form of green and blue infrastructure, such as SuDS and green roofs that would reduce the infiltration rate of precipitation as well as provide storage for storm water run-off.

11. Environmental Health has not raised any concerns in terms of the impact of development on air pollution levels in the area. However, the Low Emissions Strategy (2017) EV03; Air Quality Action Plan (2018) EV03 and Air Quality Technical Paper (2018) EV04, contain strategies and actions plans which are working together to help reduce and manage emissions and improve air quality.

12. The site lies in Flood Zone 1. However, given the size and greenfield status of the site, a Flood Risk Assessment would be required in order to assess any risk of flooding and propose mitigation measures to reduce such risks. The Council's Flooding and Drainage Section has commented that several past drainage issues have been reported in the surrounding area and actions in place to resolve these. They have indicated that the site is suitable for development after a Hydrological Assessment of Wood Fall Beck and surface water assessment is carried out. Mitigation measures have been suggested in the form of green and blue infrastructure, such as SuDS and green roofs that would reduce the infiltration rate of precipitation as well as provide storage for storm water run-off.

13. The site is not located in an area of designated unstable land. However, if evidence comes to light demonstrating land stability issues at the site, a Land Stability Report will be required at the planning application stage.

14. The level of housing need in Calderdale has been derived using the Government's standard housing

methodology, and used the most recent datasets published by the Office of National Statistics in 2016. The Plan will meet the housing need of the Borough for a period of 15 years. The Plan period is therefore 2018/19 - 2032/33. As the most up to date figures relating to the affordability factor were being used, these take into account any under supply over recent years.

The Council's response to the Inspector's Pre-Hearing Note 1, Question 5, elaborates on the reasoning behind the Council's decision to base the housing requirement on the Standard Method (App 1.5 to PHN 1).

15. Policies HS3 (Housing Mix) and HS4 (Housing for Independent Living) of the Local Plan address the needs of older people within the borough. Policy HS3 of the Local Plan establishes an approach to ensure the delivery of a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community.

16. The paper to the Local Plan Working Party 17th August 2016 attached to evidence document EV09 considers the distribution of development throughout the Local Plan process. The Council considers its distribution of development to be justified and supportive of sustainable development.

Duty to Co-operate

Main Issues:

Council's Response:

Suggested Modifications

1. The site should be removed from the Local Plan.
2. A full Preliminary Ecological Appraisal and other appropriate protected species surveys in addition to sensitive landscape schemes (including SuDS) to ensure no impacts to Local Wildlife Site or fragmentation of Calderdale Wildlife Habitat Network.
3. Sensitive lighting schemes and net gain in biodiversity should also be implemented.

Council's Response:

1. No change required - The site's allocation is considered consistent with the Council's site allocation methodology and positioning in the trajectory as set out in the Housing Technical Paper.
- 2/3. In terms of ecology, the land consists of semi-improved grassland, hedgerows and scattered shrubs, it also borders the Wildlife Habitat Network on its north eastern boundary. The Conservation Section (Ecology) has indicated that development would be acceptable subject to various mitigation measures, including the undertaking of a ornithological survey and biodiversity enhancement providing locally native species rich unimproved grassland and locally native species rich hedgerows, restoring the gaps in the Wildlife Habitat Network. Recommendations have also been made with regard to the provision of SuDS that will also be carried forward as site specific considerations. Ecology consultees have not requested further surveys or sensitive lighting schemes.
No modification required.