

CALDERDALE LOCAL PLAN

Representations and Responses Document

Chapter 9 - New Housing Sites:

Garden Suburbs - LP1451 and LP1463

Calderdale Metropolitan Borough Council

July 2019



Document Section: LP1451 - Garden Suburbs - Brighouse

Representations

Comment ID **APX1012**

Site ref (if applicable): **LP1451**

Person ID: **1183705**

Name: **Mrs Adele Hannah**

Organisation:

Agent ID:

Name:

Organisation:

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 LPA have not considered the impacts closely enough to accommodate the proposed development; Highways & Infrastructure All of the artery routes serving the town centre are already heavily congested, how will the existing highways network cope with the volume of traffic? What improvements are proposed to ease congestion? The creation of a new motorway junction will increase the volume of traffic around Huddersfield Road which will be travelling at a high speed. This will impact safety, noise and congestion for residents. Junctions in close proximity and on a steep incline on the motorway will cause bottle necking and further congestion on the M62. This is likely to increase accidents on the motorway which have a serious knock on effect on levels of traffic in the local area. Huddersfield Road is already problematic to join from Woodhouse Lane/ Armitage Avenue/ Daisy Road due to the heavy volumes of traffic and speed at which they travel. There has been an increase in accidents on all of those junctions over recent years, and this will only get worse. Further vehicles will add to the misery and tailbacks down Woodhouse Lane and surrounding streets - these are already used as a rat run by many endangering children travelling to the local primary school. There are no roads proposed which would be suitable as access roads to accommodate the increase in traffic. Woodhouse Lane is already used as a rat run to avoid the large queues on Huddersfield Road. The implementation of the 20mph zone is ineffective unless enforced. Traffic continues to travel at speeds much greater than this despite the signs. Woodhouse is an area with a large number of young families and pets. With the amount of on street parking crossing the road is problematic at the best of times. Further vehicles on the road will only increase the danger people face when walking in the area. Pollution Calderdale is already one of 23 areas in the country which has not met its air quality targets. Due to the proximity of the M62, Brighouse has more than its share of traffic compared to other more rural parts of Calderdale. An increase in vehicles due to the housing proposal will only be of detriment to those already living in the area. What proposals are in place to protect the people already living here and the adverse health impacts or increased pollution? Flooding Brighouse has suffered historically from severe flooding. Building on green spaces in the vicinity will impact the potential for further flooding due to soakaway and surface runoff. Fields in LP1451 protect the town centre and industrial estates at present. Ecology The open spaces between Woodhouse and Bradley Woods are home to a variety of wildlife including but not limited to deer, bats, pheasant, birds, flora and fauna. The trees help to protect properties on Woodhouse Lane from the noise of the M62 and reduce pollution. Open space This development will result in a loss of open space and areas for walking for residents and a loss of agricultural land. Green space is valuable and provides a haven for residents to spend their free time. Business and economy It has been widely analysed in the media that traffic congestion costs UK economy £4.3 billion a year. The levels experienced in Brighouse can therefore only have a negative effect on the

economy of the local area and deter people from visiting. A further 4,500 houses planned for Brighouse could result in up to an extra 9,000 cars living within the town and travelling on the roads adding to congestion. Environmental health There will be a significant increase in air and noise pollution not only during the construction phase but as a result of the new properties and additional traffic. There will be a loss of visual amenity for the properties who live on Woodhouse Lane, many of whom paid a premium for their houses due to the open space to the rear. Green Belt According the National Planning Policy Framework (NPPF) paragraphs 79 to 92 the fundamental aim of the Green Belt is to prevent urban sprawl. The Green Belt serves 5 purposes; - 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 - to preserve the setting and special character of historic towns - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land The proposals outlined in the Local Plan directly challenge each of the above purposes. The areas of Calderdale and Kirklees will become one, only separated by the eye sore of the M62. There will no longer be any distinction between the two, Brighouse and Bradley will have no green areas to separate them. There are many brownfield sites available throughout Calderdale and it is questioned why they are not being utilised instead of the Green Belt? The Green Belt should only ever been used as a final resort and only in a scale which is suitable to the local area, not merely due to the convenience of having a large area and the economies of scale to build on it. The NPPF also states that; 'once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land'. Once again these proposals have not been taken into consideration by Calderdale Council as the plan will not enhance the landscape, visual amenity and biodiversity. Nor will it improve the land which is there at present. There are no opportunities proposed to provide access to sports or recreation for the additional number of people who would be living in the area. England has 14 Green Belts in total, covering 13% of the land. It is for this reason that they should be protected and not exploited. There do not appear to be any 'very special circumstances' as required for Green Belt development to this application. The only benefit it would appear is the financial benefit to Calderdale Council despite their clear disregard for local residents. The development is wholly inappropriate by virtue of its size and appearance and should therefore not be allowed. Calderdale has a number of brownfield sites available which are not been proposed for development even though they would be more suitable. Community Infrastructure Levy (CIL) Why has the CIL been set at £85/sqm for Hebden Bridge and only £40/sqm for this site? Surely using differential rates is encouraging development in one area over another? Brighouse will be suffering from a complete overdevelopment and will not be financially benefiting at the same rate as Hebden Bridge would with a higher CIL.

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

Duty to Co-operate Reason:

Suggested Modifications:

Assess brownfield sites rather than just Green Belt. Make development more proportionate throughout Calderdale.

Additional Evidence Link:

Comment ID **APX1028**

Site ref (if applicable): **LP1451**

Person ID: **1183714**

Name: **Dr John Hearson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Other comments have covered many of the main points i would wish to make. I am a resident of Rastrick who finds the green spaces around the village to provide a pleasant area in which to walk and enjoy the countryside. I have no wish to live in an environment that is totally built on. The congestion on Huddersfield Road during the rush hour is appalling, and I find it horrific that this will be added to by the traffic from a huge new development. The proposed Junction 24A of the M62 will alleviate this (at the expense of yet more land) but - will it be built? All around the valley I see abandoned mills and other disused land that could be tastefully converted into housing. Developers prefer green belt sites because it makes their job easier. But - what about the food shortages that we shall experience later this century? Once our prime farming land has gone, it is gone forever. I do not believe the Plan has made adequate efforts to use brown field sites. The plan makes great play of the attractiveness of Halifax as the 'jewel in the crown' of Calderdale. Brighouse and Rastrick, conveniently situated at the mouth of our valley, is regarded as the sacrificial lamb, an easy target for development. It is unfair to disproportionately burden Rastrick with so high a percentage expansion. Development has to be fair to all the residents of Calderdale.

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 **APX1029**

Site ref (if applicable): **LP1451**

Person ID: **954770**

Name: **Ms Gillian Mulhall**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Disproportionate allocation for an area not consistent with national policy & legislation. Woodhouse garden suburbs is not sustainable and contrary to the national planning policy. Exceptional circumstances not justified. Discrepancy in Woodhouse site which is addressed as poor in terms of access.

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

Sound Reason:

Disproportionate concentration of new homes significant with nearby Kirklees. Delivery of necessary

infrastructure is critical for Brighthouse no evidence in any highways plans. Access to site - Firth house lane is protected, Ryecroft lane is unacceptable/unsafe as is on a blind bend with only one side of the road clear due to horrendous parking their cars outside their house. Woodhouse area cannot take anymore traffic it is already a rat run for Birds Road industrial estate local school and is a suburban area. The impact on Brighthouse will be horrendous with the thousands of cars all trying to get to where they need to be. The only bit of green belt land left in this area is vital for health. Air quality will be severe and council cannot meet its air quality targets now. Woodhouse site should be removed from the SD7 and retained as green belt. The existing greenbelt forms a defensible boundary.

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

Duty to Co-operate Reason:

No in-depth analysis of housing needs across the wider area.

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX1034**

Site ref (if applicable): **LP1451**

Person ID: **1182579**

Name: **Mrs Marilyn Denney**

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 **APX1040**

Site ref (if applicable): **LP1451**

Person ID: **1181961**

Name: **Mrs Julie Bullen**

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?: **No**

Sound Reason:

I object to the developable area shown for site LP1451. The Heritage Impact Assessment indicates that Firth House Lane should be protected in its current form. This is not shown. The comments on the site reports from Natural England say that there should be a 20m set back from Bradley Wood - this is not shown correctly for the full extent and undermines the deliverability of the proposed site. the proposed access routes are not therefore acceptable as proposed and the masterplan is therefore unachievable in this respect. This warrants the plan unsound

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

Duty to Co-operate Reason:

Suggested Modifications:

Developable area should be fully checked and amended to correctly show the areas that are not developable. There will be other areas of protection that have not been assessed as yet with regard to ecology. The protection of Firth House Lane and associated heritage assets affects the delivery of this site overall and achievement of the proposed masterplan especially with regard to access. Without evidence to confirm this is achievable, the site should be removed .

Additional Evidence Link:

Comment ID **APX1055**

Site ref (if applicable): **LP1451**

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:

Although we agree with the requirement for the production of a PEA and EMP, we would also like to see retention of woodland and CWHN in form of the rail corridor, along with sensitive lighting schemes and landscape plans (including SuDs) to achieve a net gain in biodiversity.

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 **APX1079**

Site ref (if applicable): **LP1451**

Person ID: **1182627**

Name: **Mrs Jean Leach**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Unsure of legalities.

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:

Scale of development planned for Brighouse could be of concern to 'highways, England.' With reference to their report on Calderdale local plan excerpt 1 Capacity issues at M62 Junction 25. Junction 25 forms a key access point for both Calderdale & Kirkless. Has this proposed plan been positively prepared and based on effective joint working on cross-boundary strategic priorities between Calderdale & Kirklees & possibly Bradford authorities? From what I understand from the Woodhouse School meeting, Kirklees & Bradford authorities might not have been approached, nor agreed to cooperate on the expensive plan. Calderdale road are already full of potholes and, obviously, money has not been readily available to repair them. So how can this unsatisfactory plan be justified? Have brownfield sites not been considered? 'Green lung' areas should be recommended between neighbouring council. The only 'Green Lung' area in our local environment is between woodhouse lane and the Huddersfield boundary, taking in the ancient Bradley woodland which features a wonderful and popular scout camp.

Suggested Modifications:

I would not be in agreement with any modifications whatsoever. From a local resident's point of view, it would be totally unsound, ineffective & no reasonable alternative would be justified:- Lack of Infastructure. a) Roads not in place. b) Schools are at capacity already. c) Surgeries are full. Traffic conjection - Huddersfield Road into Brighouse is already a big problem. An extra 2500 vehicles (based on 2 per household) would cause utter chaos. Increase in noise from traffic (already noise can be heard from Huddersfield road & motorway traffic) Unavoidable noise from a greater volume of cars would be unacceptable to local residents. Air pollution form increased volume of cars would compromise the health of everyone, particularly young pupils from Woodhouse Primary School and the nursery - Both schools having playground outdoors. Council's priorities should be to conduct planning without compromising air quality and, whenever possible, to incorporate measures to improve air quality! How can this possibly be achieved when the latest plan in the woodhouse area will increase dramatically the air pollution & potentially, take it over the legal limits? Mindful of 'New planning guidance' surely relevant councils (Calderdale, Kirklees and possibly Bradford) should be considering all other options before allocating green belt land for development? Green belt is being sacrificed to build new homes - But at what cost to the local people who already live there?

Additional Evidence Link:

Comment ID **APX1080**

Site ref (if applicable): **LP1451**

Person ID: **1182579** Name: **Mrs Marilyn Denney** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

The plan is not legally compliant as the has not been efficient community involvement prior to the proposed increase of 31% in our town. The woodhouse garden suburb was not in the original proposal and is contrary to greenbelt policy.

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

Sound Reason:

The plan is unsound as the council cannot provide evidence that the bulk of the housing growth should take place in Brighouse as opposed to other areas in the Calder Valley. There is no plan to increase the infrastructure of access to the site and extra traffic in the town has been created twice this week due to the stationary traffic on the M62.

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 **APX1082**

Site ref (if applicable): **Lp1451**

Person ID: **1182919** Name: **Mr John Northrop** 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:

This farmland/greenbelt makes a contribution to agriculture/food production. The landscape and biodiversity/animals, wildlife, trees and many footpaths will be a great loss. This development will add to air pollution. Brighouse is already in an air management area. This area at present forms a green corridor between Kirklees & Calderdale. Kirklees also is planning to build in this area. The results of which will merge into two areas. Traffic flows to Leeds-Bradford-Manchester will in my opinion be higher than estimated adding to sever congestion in Brighouse and surrounding areas. The local infrastructure cannot

cope now, I don't feel that this has been given the correct consideration.

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

Duty to Co-operate Reason:

Suggested Modifications:

This site is in area of green open space forming a pleasant boundary and should be left so.

Additional Evidence Link:

Comment ID **APX1084**

Site ref (if applicable): **LP1451**

Person ID: **1182918**

Name: **Mrs Jill Stocks**

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:

Nowhere near enough consideration has been given to the impact such a huge estate will have on our small town whose roads are already choked with traffic, often bringing the town to a complete standstill. To walk up or down Huddersfield road is an unpleasant experience with exhaust fumes polluting the area. With many families owning 2 & 3 cars, the traffic from over 1000 new houses attempting to use Huddersfield road is horrifying; at all times not just rush hours. Where will all the children go to school? Will school playing fields disappear in order to accommodate more classrooms? With green belts & farmland disappearing, our children will lose the pleasure of seeing wildlife in the area. Has thought been given to building new surgeries for extra doctors & dentists? Our present health facilities are over-stretched as it is. This scale of development will enrich no one but the builders, and I feel the town and the woodhouse area are being coerced into accepting a grossly unfair and ill-considered plan for one small area of Calderdale.

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

Duty to Co-operate Reason:

Suggested Modifications:

The building of a new road system to relieve the pressure on Huddersfield Road should be a priority along with doctors' and dentists' surgeries, and proper educational facilities. As it is a government initiative, all government departments concerned should produce detailed plans and confirm timescales to ensure work is carried out before house building. If infrastructure is not sufficiently addressed by government departments then it will be up to local councils to pick up the bill for the ensuing chaos, adding to their financial problems. If the area has to have housing then an alternative scheme would be to have fewer houses and more facilities on site which could be of benefit to others nearby, but only after proper consultations and local agreement.

Additional Evidence Link:

Comment ID **APX1085**

Site ref (if applicable): **LP1451**

Person ID: **960897** Name: **Ms Margaret Woodhead** 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:

Garden suburbs Brighouse between woodhouse lane & Bradley woods. 1257 Houses. 4.(2) Soundness Infrastructure - there are no plans, finance a details. Surrounding roads need improving - Schools, doctors surgeries, communal areas are not shown. Air Quality is already below targets triggering more health issues, what about our children/grandchildren's well being. Walking and cycling will become an unhealthy pass time.

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

Duty to Co-operate Reason:

The Huddersfield/Bradley housing scheme also affects the woodhouse development, as does Clifton M62 jc 24a needs definite finance - this is not in place but is needed to alleviate the dire traffic congestion before any houses are built at all.

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX1086**

Site ref (if applicable): **LP1451**

Person ID: **960891** Name: **Mr D Woodhead** 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:

There are inadequate plans for the necessary infrastructures - proposals may have been made but no finance or details are available. eg. Better schools, extra school & hospital places etc. that would be

required and needed. Air quality targets are not met now, and figures already show above average health issues are evidenced. Outdoor activities, walking, cycling & indeed motoring will become an even more unhealthy activity.

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

Duty to Co-operate Reason:

No evidence is shown of the effects of neighbouring planned/proposed developments. i.e. Bradford, Clifton Housing & employment zone or particularly the adjacent Huddersfield Bradley Planning Scheme. An access to M62 (Proposed junction 24A) appears 'up in the air' with no finance on offer and no one body accepting responsibility for it's creation. Solution: Prior improved infrastructure (or some agreed with finance) is needed before such a U.D.P as currently proposed, on these scales, can be absorbed.

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX1088**

Site ref (if applicable): **LP1451**

Person ID: **1182906**

Name: **Mrs Linda Avison**

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:

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

Duty to Co-operate Reason:

Suggested Modifications:

as a pedestrian I find it difficult to cross Huddersfield Road and this is before mass housing scheme? Walking into Brighouse people are parked on pavements and then I am faced with pollution from idling traffic. I am led to believe that Wakefield road has the heaviest pollution in the area.

Additional Evidence Link:

Comment ID **APX1090**

Site ref (if applicable): **LP1451**

Person ID: **959174**

Name: **Mrs Barbara Shaw**

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:

I object to the allocation of the Wodhouse Garden Suburb (LP1451) and its removal from Green belt. This is because:- The SE Strategic Vision is inadequate. There is insufficient technical evidence for this scale of development at this stage to provide a proper framework for development to show the site is feasible at this scale. Adequate information has not been provided to show suitable means of access topography, protection of wildlife and habitats, noise buffers required from the motorway, drainage, and impact on existing properties, health capacity within Brighouse to serve a development of this size, early years provision. To developable area submitted is questioned without this There are discrepancies in housing numbers and densities proposed There is no scheme or design for the potential strategic motorway junction M62 24a. How can the main access to site be satisfactorily planned or provided without this? The release of the housing site is premature and not suitable in this plan review - if at all. Flooding impact has not been quantified on surrounding areas - land will channel runoff down the hill into flood zone 2, river calder and main train line. Run off from fields has increase over the last few years resulting in the cellars of 3-9 flooding and natural springs exist within the site. Start date and delivery timescales are not realistic for a scheme of this size. Allocation at odds with council's own assessment of site - which indicates it is not a sustainable location. Garden suburb concept is aimed not only at housing - but the additional benefits it will bring. There is no evidence that this location and its benefits will exceed the harm done to the green belt. Green belt will be significantly harmed and its release not justified. The harm to green belt, heritage and ecology and surrounding community and infrastructure are not justified on the basis of new homes and a standard amount of affordable homes. This is shown as the most sensitive green belt in the council's assessment - it fulfils 4 out of 5 reasons for inclusion and additionally has heritage value. It performs a strong strategic role - preventing the merger of Kirklees and Calderdale. Since the Bradley Road site, on the other side of Bradley Wood, has recently been approved by an inspector for the Kirklees Local Plan this further reduces the strategic role this land performs. It would leave Bradley Wood in isolation - this has very restricted access which cannot be classed as 'accessible open countryside' The purpose for including land in greenbelt would therefore be lost. Heritage assets and landscape character significantly harmed. The recent heritage impact assessment restricts development from parts of the site. There should be NO development around firth house farm and the access along firth house lane is to be protected as well as other parts. This is critical as it prevents the main access through the length of site. I therefore consider the vision for site would harm setting of heritage assets and is not sound or deliverable. Firth house lane is shown as developable area - this is incorrect - it needs to be protected A 20m buffer from Bradley Wood is required by Natural England. To protect the ancient Woodland. This is also not shown on developable area. Since the technical evidence is lacking other areas that should be protected are also not shown. There are protected species within the site which the Council consider to be priorities such as hedgerows,xxx Phasing/Infrastructure delivery If the site was to be released is should not be developed until the main access is in place to protect the amenity of the existing residential areas. Woodhouse Lane and Daisy Road are heavily congested with on street parking, narrow passing points and roads. They are unsafe to accommodate the construction traffic associated with the development or large numbers of vehicles. Access from Firth House Lane is unacceptable - it is a single track that needs to be protected in its current form as the access forms part of the setting of the listed farm buildings. Access from Ryecroft lane is also unacceptable and unsafe to support the level of early development proposed. It lies on a blind bend, there is on street parking from 6-20 Woodhouse Lane as well as up Ryecroft Lane. There are multiple entrances onto the lane where cars reverse to gain access/egress. The residential area is not suitable for construction traffic. From Birds Royd to 7.5t restriction on the railway bridge also restricts construction vehicles.

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

Duty to Co-operate Reason:

Suggested Modifications:

To make the plan sound and for reasons outlined in 5 the plan should be modified to remove woodhouse garden suburb site LP1451 from SD7 and retained as green belt as exceptional circumstances for its release have not been demonstrated and there will be more harm than benefit. The existing green belt boundary forms a defensible boundary and should be retained. If an inspector were to approve the site for development Early phasing should be removed until such time as main access can be provided from A641 to protect the existing residential area at Woodhouse. Site capacity should be reduced to realistically reflect the required protection areas across the site where no development should occur.

Additional Evidence Link:

Comment ID **APX1097**

Site ref (if applicable): **LP1451**

Person ID: **1130533**

Name: **Mr Nick Midgley**

Organisation: **Chair person rastrick
Neighbourhood Forum**

Agent ID: **1130525**

Name: **Mr Nick Midgley**

Organisation:

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

Legal Compliance Reason:

See attached

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

Sound Reason:

See attached

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

Duty to Co-operate Reason:

See attached

Suggested Modifications:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5081009>

Comment ID **APX1101**

Site ref (if applicable): **LP1451**

Person ID: **1183029**

Name: **Mr John Avison**

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:

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

Duty to Co-operate Reason:

Suggested Modifications:

Why is this part of Calderdale getting the bulk of the houses. New roads needed as the traffic in Brighouse is terrible. Parking for Woodhouse school floods the local streets twice a day. Traffic to Leeds on M62 is too heavy now! Wakefield Road is packed and the new LIDL supermarket adds to the problem. Driving into Brighouse from my house means a long queue now! The planned road mods are too small.

Additional Evidence Link:

Comment ID **APX1102**

Site ref (if applicable): **LP1451**

Person ID: **1182679**

Name: **Mr Paul Dixon**

Organisation:

Agent ID:

Name:

Organisation:

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 consider the proposal to build in excess of 1200 houses on land between Bradley Wood and Woodhouse Lane to be manifestly flawed. Whilst the area designated for development no longer attracts its previous status as 'Green belt', nevertheless it is a semi rural location home to numerous wild life species including owls, bats, pheasants and deer. It cannot be overstated that there is an absolute need to preserve the area in its existing form. I shall now expand on my reasons for objecting to this plan applying the interpretation of 'soundness' contained in the planning policy framework. Having regard to the question of infrastructure this particular plan has been approved without a thought being given to the issue of access and egress to the site which is currently serviced by relatively narrow single carriage roads. Were this proposed development to have any merit, which frankly in my opinion it does not, then a necessary pre-requisite would be advanced planning and provision of an enhanced road system, which, given the current configuration of the Woodhouse estate renders any such improvement totally impracticable. Continuing the theme of access not only are the existing roads relatively narrow, indeed one of them, Shepherds Thorn Lane, a cul-de-sac leading directly to Bradley Woods, has no pavement! Whichever route one takes to the Woodhouse estate access to this development would have to be from Huddersfield Road. You may or may not be aware that Huddersfield Road, Brighouse is the A641. It is an extremely busy trunk road, the scene of a number of fatal road accidents from which access can be gained in both directions to the M62

motorway. Volumes of traffic are high both at peak times and throughout the day, this traffic being a mixture of local and through traffic with a high proportion of heavy goods vehicles. The road carries a number of bus and coach routes of which some are school buses. Brighouse town centre is less than a mile from the proposed development and is a highly congested bottleneck. Whenever a problem arises on the motorway motorists leave the M62 at Ainley Top and enter Brighouse via Rastrick causing gridlock with queuing traffic extending back across the motorway and into Kirklees. Vehicular access from the Woodhouse estate into Huddersfield Road is hazardous even outside peak periods. In particular the junction of Woodhouse Lane/Huddersfield Road/Shepherds Thorn Lane is a notoriously dangerous junction with many accidents over the years The planners appear to have given short shrift to any provision to mitigate this danger. The crossroads which is effectively formed by the junction of these roads merits traffic lights. Any proposed provision? Not according to the plans.

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 **APX1113**

Site ref (if applicable): **LP1451**

Person ID: **229412**

Name: **Thornhill**

Organisation: **Thornhill Estates**

Agent ID: **229408**

Name: **Mr Jonathan Dunbavin**

Organisation: **Associate I D Planning**

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:

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:

See attachment

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5082101>

Comment ID **APX1120**

Site ref (if applicable): **LP1451**

Person ID: **1118993** Name: **Mrs Hazel Sanderson** 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:

Inadequate public consultation in my local area. I have seen no evidence of joint discussion with Kirklees. re the joint impact of proposed large development of adjoining boundaries. Inevitably both authorities developments will impact on each other but this is not taken into account. Assessment of current roads/capacity cannot be accurately assessed without including impact of Kirklees development. Already Calderdale fails to enforce current restrictions on traffic ie. 20mph, No HGV over bridge in Woodhouse. Proposed development areas have been dictated by availability of land & not objectively assessed, or based on local need. An increase to Brighouse housing by over 30% completely changes the local community. Garden suburbs proposed do not meet the definition of garden suburb, the numbers of houses proposed would make it unlikely a green belt would be retained. Access roads into all sites are inappropriate & inadequate. The timescales of such a large development would have an intolerable impact on the current residential area, with everything large scale construction brings. Land donated to the council at Stratton Road included covenant to not develop. How does the proposed development fit with the proposals to create a 'forest' along the M62 corridor to combat noise & pollution.

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

Duty to Co-operate Reason:

Suggested Modifications:

Further local consultation, politically the area is under represented. For council decision making. Stratton Road consultation. Clarification of infrastructure improvements including junction 24a. Object impact report of Kirklees & Calderdale developments where boundaries meet.

Additional Evidence Link:

Comment ID **APX1124**

Site ref (if applicable): **LP1451**

Person ID: **954837** Name: **Ms Catherine Kirk** 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 have significant concerns about the infrastructure in Brighouse town centre and surrounding areas if the proposed 1257 houses are built in the LP 1451 site between Woodhouse Lane and Bradley Wood. A housing development on this scale could generate 3,000 or more extra cars which at peak times will gridlock the existing road system that is already operating at capacity and is completely blocked when the M62 has problems. As an asthma sufferer I also have anxieties about air pollution levels becoming much worse, particularly if standing traffic becomes a daily event. Diesel fumes are particularly toxic and are already noticeable from the M62 traffic depending on the weather conditions. Similarly noise pollution will increase. The Local Plan has not convinced me that the road infrastructure will be significantly improved to cope with the development of a garden suburb. There are no plans for a new motorway junction and traffic from adjoining areas "" particularly Kirklees "" is also likely to increase as vehicles attempt to access the M62 via Brighouse town centre. The proposed bypass of the Bradford Road into Brighouse fails to address the traffic issues on the Huddersfield Road through Woodhouse. Brighouse requires a second river crossing and access to Birds Royd Lane industrial units from the Wakefield Road without entering the town centre. Only with such a radical change in infrastructure can Brighouse and Rastrick cope with housing development. However the Local Plan does not address these solutions. It may even prevent such changes ever becoming a possibility. New housing also brings a large increase in population and therefore schools, doctors surgeries and community facilities will be essential. At present there is no spare capacity and Rastrick High School has recently sacrificed its Sixth Form to make space for growing numbers of children age 11-16. I am not convinced that the Local Plan has adequately provided for these essential services in the very limited green space available around existing housing. I anticipate that a vast increase in families and cars will result in road safety problems in the Woodhouse area in the future. I would welcome information in the Local Plan describing possible planning gains for the community if the proposed sites were developed for housing. The plan does not explicitly state what these facilities and improvements could be and who would pay for them. I do not support development on the LP 1451 site for the reasons stated above.

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 **APX1128**

Site ref (if applicable): **LP1451**

Person ID: **1184942**

Name: **Mr Mark Bullen**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

See attached

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

Sound Reason:

See attached

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

Duty to Co-operate Reason:

See attached

Suggested Modifications:

See attached

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5084622>

Comment ID **APX1153**

Site ref (if applicable): **LP1451**

Person ID: **1182231**

Name: **Mrs Rebecca Holmes**

Organisation:

Agent ID:

Name:

Organisation:

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 very disappointed by the scale of these plans. I believe that this site is proposing disproportionate building on green belt land. There is much evidence that this land is important to local wildlife and is one of the most sensitive sites in Brighouse. The plan seems dependent on the proposed motorway junction which is uncertain. This would also have a negative impact on the wildlife. There is a severe lack of information on proposed changes to the infrastructure of Brighouse. I have lived here for 13 years and have seen an increase in traffic over this time. The development would see an increase in traffic over this time. The development would impact this. Furthermore there are no clear plans for doctors, dentists, schools etc. I don't understand how these plans can be sound. 3) Duty to Co-operate This development does no co-operate with the Kirklees/ Bradley wood plans. 'Bolt on' housing estates with no services and infrastructure cannot be properly planned. The plans are truly ridiculous. Can the council provide any evidence that co-operation has taken place? Does Brighouse have a need for such housing? Is that need not solved by the Kirklees/ Bradley wood development? the Leeds city region strategic economic plan does not highlight Brighouse as a key site. In fact, Halifax is highlighted as a focus for Calderdale. Why is Brighouse receiving more housing when Kirklees already has such a large development in process? how can this be compliant with the duty to co-operate?

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

Duty to Co-operate Reason:

Suggested Modifications:

Build on brown belt land first. Plan proportionate housing. (A 31% increase in Brighouse is not proportionate) Build on smaller sites across the whole of Calderdale rather than over- developing green belt land.

Additional Evidence Link:

Comment ID **APX1156**

Site ref (if applicable): **LP1451**

Person ID: **1183137** Name: **Mrs Susan Hey** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

4. (1) I would assume that Calderdale Council has been efficient enough to be legally compliant. 4. (2) a) inadequate infrastructure plans. b) Air quality and pollution. c) disproportionate plans for housing in certain areas of the borough. d) Plans are therefore not fit for purpose. 4 (3) No evidence of consultation and/or co-operation with adjoining boroughs.

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

Duty to Co-operate Reason:

Suggested Modifications:

A necessary modification is to improve present infrastructure, especially in the Brighouse area as traffic congestion is worsening daily. As a result, air quality is deteriorating rapidly in the area already considered to be below suggested safe levels. Residents are already suffering from ill health, particularly with chest and lung disease, and local GP services are struggling to cope. Urban areas need green spaces to act as lungs, to preserve habitats, trees to combat pollution and noise. The suggested plan for massive housing in and around Brighouse is disproportionate to the whole of Calderdale, and will create more concerns to the above mentioned problems, especially as it will be so close to the M62 motorway, therefore not fit for purpose.

Additional Evidence Link:

Comment ID **APX1160**

Site ref (if applicable): **LP1451**

Person ID: **1183145** Name: **Mr Nigel Holmes** Organisation:

Agent ID: Name: Organisation:

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 proposed site is located on greenbelt land. This will be catastrophic for wildlife and set a precedent for future greenbelt destruction. With regard to infrastructure and services, they are simply not there. The proposed number of houses will impact massively on the area and without the required infrastructure and services implantation, the area will simply not be able to cope. What evidence has been allowed to justify the amount of housing development in Brighouse? Halifax is significantly larger. With regard to the infrastructure levy. Please clarify what is being changed of the developers? I understand this money goes towards infrastructure. With so much development surely there will be significant money raised though the infrastructure levy. Will this go towards infrastructure?

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

Duty to Co-operate Reason:

Suggested Modifications:

There is significant brown belt land with in Brighouse. It is not appropriate and proportionate to build on green belt land. The amount of houses proposed for the woodhouse area is not fair and too much. The area will simply not be able to cope. I would also like an explanation how it will be sustainable to build so many houses on such a small area. I would also stress again the Leeds city council plan does not identify Brighouse as an area that need this amount of housing.

Additional Evidence Link:

Comment ID **APX1186**

Site ref (if applicable): **LP1451**

Person ID: **1121751**

Name: **Mr James Sanderson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Inadequate public involvement for a development on this scale. Therefore planned development is not sustainable.

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

Sound Reason:

No evidence that infrastructure will be in place before development. Proportion of building on green land (90%) will have detrimental effect on local environment.

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

Duty to Co-operate Reason:

No evidence seen on consultation with Kirklees regarding their development on near border.

Suggested Modifications:

Further public consultation. Further research on the viability and effects the extra people will have on the local area and services. Infrastructure/Road/Motorway networks that are to be built to accommodate the extra traffic should have detail as to when it will be started and when it will be finished. Evidence should be

provided to show the effect that all this extra hard surface will have on the River Calder which already floods in most winters.

Additional Evidence Link:

Comment ID **APX1216**

Site ref (if applicable): **LP1451**

Person ID: **1121198**

Name: **Mr Adrian Frearson**

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/5104184>

Comment ID **APX1218**

Site ref (if applicable): **LP1451**

Person ID: **1139521**

Name: **CLlr Sophie Whittaker**

Organisation: **Councillor**

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:

This is the largest designated Green Belt site and Wildlife corridor in the Rastrick Ward, with an existing primary use of agriculture. Not only would the loss of large open spaces, agriculture and wildlife habitats (to name but a few community benefits) be devastating to the Rastrick community, there are also major concerns relating to overcrowding and the inadequate level of local infrastructure in order to cope with a population increase of this scale. By the Council's own admission, this site is a with accessibility constraints which has been modelled in its entirety, according to the IDP "without any associated infrastructure" This is a real cause for concern. If one of the two sites of which the whole Plan relies heavily upon is proposed

without any associated infrastructure, reason is given to seriously question the integrity of this entire Plan. As Councillors for the area, we regularly receive complaints from local residents, particularly in Woodhouse, who report traffic congestion in and around the neighbourhood, often stating how difficult it is to drive around the area due to the amount of pavement parking. This is an ongoing issue that has not been dealt with for years and will only be exacerbated with additional numbers of dwellings added to sites around Woodhouse & Rastrick as a whole. Additionally, Huddersfield Road is already at capacity and is severely congested at peak times and often at other periods throughout the day "" another issue we regularly receive complaints about. As already stated, the ecological balance would be truly impacted if this and other neighbouring Green Belt/Greenfield sites are developed. The locality highlights the crucial part the local ecology plays in everyday life. Motorway noise is already an issue on the site, as well as land contamination, non mains drainage, and the ongoing impact on the Brighouse Air Quality Management Area. Residents are fully opposed to the development of this site, which would see the loss of much of Woodhouse's countryside, local footpaths, trees, hedgerows, wildlife habitats, opportunities for children/adults to roam and experience nature (the site is well used by Bradley Wood Scout Club) and Green Belt space. It is worth mentioning that several planning applications have been submitted for this site over the last 50 years, none of which have been successful.

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/5103797>

Comment ID **APX1252**

Site ref (if applicable): **LP1451**

Person ID: **1136150**

Name: **Mr Peter Toothill**

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:

THIS COMMENT WAS RECEIVED AFTER THE CLOSURE OF THE REPRESENTATION PERIOD. There is no plan to improve the already overburdened road system. Funding for extra motorway junction turned down by Kirklees. There is no provision for extra traffic. No new school or medical facilities in the area despite existing ones being over subscribed. The Calderdale plan will link adjoining MDC areas creating urban sprawl and no green space between it and other MDC areas effectively cutting off corridors for wild life and destroying habitat, which houses some endangered species. Air quality in the area is already below acceptable levels and no provision is included to improve it. Building in this area will remove valuable soakaway and lead to flooding and possibly make the railway embankment unstable.

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

Duty to Co-operate Reason:

Suggested Modifications:

THIS COMMENT WAS RECEIVED AFTER THE CLOSURE OF THE REPRESENTATION PERIOD. Spread development more thinly over the whole area. Improve traffic flow through Brighthouse and surrounding areas. Build where it is needed as opposed to profitable.

Additional Evidence Link:

Comment ID **APX1253**

Site ref (if applicable): **LP1451**

Person ID: **1139370**

Name: **Mr Len Davies**

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:

THIS COMMENT WAS RECEIVED AFTER THE CLOSURE OF THE REPRESENTATION PERIOD. The existing accesses ie Firth House Lane, Shepherd Lane and Ryecroft Lane are unsuitable for the size of the development. Firth House Lane is only 6 yards wall to wall with no pavements. Shepherds Thorn Lane is also 6 yards wall to wall of private houses with no pavements. Ryecroft Lane is yards pavement to pavement . None of these would be suitable for construction vehicles. A new access to the M62 was proposed but may not happen.

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

Duty to Co-operate Reason:

Suggested Modifications:

THIS COMMENT WAS RECEIVED AFTER THE CLOSURE OF THE REPRESENTATION PERIOD. To be compliant the site requires a new access constructed to accommodate heavy vehicles for the requirements of the proposed construction. Under no circumstances should these vehicles could use Woodhouse Lane which is already used by vehicles Huddersfield Road and using Woodhouse Lane as a short cut to Birds Royd where they work. They also use Woodhouse in the evening after work, with all the cars parked on the road it is impossible for construction vehicles to use Woodhouse Lane, therefore the three access mentioned would not be suitable.

Additional Evidence Link:

Comment ID **APX127**

Site ref (if applicable): **Lp1451**

Person ID: **1178438**

Name: **Mrs Dianne Mawer**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The road infrastructure around the area has not in my opinion been looked at properly? The NIMBY'S in the planning department should get up off their backsides and come and have a good look at these roads and see the traffic and all it's problems we put up with on a daily basis especially when the school run is on? maybe bringing back the catchment areas for schools would ease the roads but only slightly?

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

Sound Reason:

In effect this strips local green belt control from the local voter (when introduced over 70 years ago it largely put an end to indiscriminate building practises) and passes it to a regional body answerable not to the local elecorate but to government!! Where will you put the wildlife corridor? Do you really care if there is one? The only winners here are the council, landowners, and farmers who will no doubt have been given incentives to sell land to the big developers? Calderdale council you are having a laugh at our expense and we won't give up without a dam good fight!

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 **APX139**

Site ref (if applicable): **LP1451**

Person ID: **1181735**

Name: **S Sutcliffe**

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 am a resident of an already congested Woodhouse Lane especially when incidents happen on the M62 causing congestion from re routed traffic down Huddersfield Road. This happens many times and the thought of another 2000 properties being built in our area is alarming to say the least. There is no infrastructure. Roads are not able to cope with another 4000 cars!!!! School already overcrowded. Doctors will be at breaking point. Dentists in short supply. What about the Green Belt which the Government said should not be built on only as a last resort. Surely further down the Valley many houses could be built ? Lots of brown sites could be used too. We have wild life in the fields and woods which will lose their habitat does anyone really care on the council. Where will children see green fields etc once developers

have built all these houses. I hope some consideration will be given to all the comments you receive.

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 **APX141**

Site ref (if applicable): **LP1451**

Person ID: **1181738**

Name: **Mr David Pitts**

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 would like to object to the two planning proposals for housing development in the Woodhouse area of Brighouse, LP 1000 for 24 houses at the bottom of Stratton Road and LP 1451 for 1257 houses between Woodhouse Lane and Bradley Road. My main objections centre on the increased volume of traffic these two proposals would create. Currently at peak periods many roads in these areas struggle to cope with the amount of vehicles which use them. I live on Stratton Road and experience these difficulties on a regular basis. An increase in traffic which is likely to follow from these developments would make it almost impossible. To improve the situation there would have to be an immediate upgrading in the roads infrastructure in these two areas and surrounding road system BEFORE any development is undertaken otherwise there would be near gridlock. My other concern is the effect these two proposals would have on local schools, NHS facilities and other amenities. Many of these are already struggling to cope and any increase in usage which these developments would inevitably lead to would bring them to breaking point.

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 **APX199**

Site ref (if applicable): **LP1451**

Person ID: **1181835**

Name: **Mrs Alison Costigan**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Please see comments below. I do not consider local people have been provided with adequate information to ensure effective community involvement.

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

Sound Reason:

Summary I consider that: the development of a large garden suburb at site LP1451 will result in grossly-disproportionate negative impacts for residents of Woodhouse and surrounding Rastrick areas, and; when combined with the other proposed large Brighouse garden suburb and Brighouse enterprise zone, it will result in grossly disproportionate negative impacts for the people of Brighouse. What follows are my comments on the 'Site Assessment Report - Main Report'. As a working parent with a shift-working partner, I simply do not have time to make well-informed comments on the rest of the plan. It is a great shame that the Site Assessment Report does not include links to relevant sections of the rest of the plan, nor more detailed information about the site assessments upon which it is based. Public consultees are, after all, mostly lay-people and the format of this consultation is not conducive to effective consultation. I have spent hours on this one Site Assessment Report, and simply do not have time for any further work on the consultation documents. Land drainage and flooding The site report for LP1451 states that 'The site is suitable for the development after the evaluation of existing drainage network and suitability of SUDS'. I cannot see how the public is expected to make well-informed comments about this aspect of the plan without having the results of this information, and further information about the effectiveness of SUDS (the report does not explain what SUDS is "" I have found <http://www.bgs.ac.uk/suds/> helpful). In my career I have worked on several catchment-wide projects and have a basic understanding of how Natural Flood Management (NFM) functions. Without understanding the role the site plays in NFM in the river catchment (i.e. what protection it affords for existing residents of Woodhouse and Brighouse), and how likely SUDS is to protect that, it is impossible to make any well-informed comments about this. Highways The report focusses almost solely on LP1451's impact on the M62, which is considered 'severe'. Clearly there is much more work to do on this, with the report concluding 'As committed schemes will not provide sufficient capacity, this site may need to deliver or contribute to the additional schemes identified by the Highways England West Yorkshire Infrastructure Study and included in the Infrastructure Delivery Plan. It is also suggested that development of this site not be commenced until later in the Plan period'. Again, with so much uncertainty, it does seem difficult for residents to make well-informed comments about this. I am concerned about the 'may' as highlighted above. Surely this should be a condition of the development, given the enormous impact it is likely to have? Much less information is provided regarding the more local impact on highways in Woodhouse and Brighouse. The report states 'three access points appear possible' "" I am assuming these are Birds Royd, Daisy Road and Woodhouse Lane. Certainly my family's own experience of those points is problematic: Birds Royd experiences significant congestion during rush hour, especially as it serves: Woodhouse residents/Woodhouse Primary School/Toy Box Nursery (from where it is the safest of the three access points to exit on to Huddersfield Road; the industrial estate; and Brighouse Railway Station. It is also very much impacted by any traffic backing-up in Brighouse or on the M62. On several occasions I have been waiting 20 minutes and more to pull out onto Huddersfield Road. Daisy Road is extremely hazardous to pull out from as visibility down Huddersfield Road is poor. I have seen the aftermath of several collisions here and personally do not use this as an exit from Woodhouse as I consider it unsafe. I was unfortunate to be a witness to a serious accident one street down (the Lord's Lane/Aire Street junction with Huddersfield Road) and when I gave my statement to the parties' insurance investigator he confirmed he wouldn't use Aire Street or Daisy Road junctions as he considered them unsafe. Woodhouse Lane is also hazardous due to poor visibility downhill. Again I have witnessed the aftermath of accidents here, and have also witnessed numerous near-misses. The report states

that 'Transport Assessments would be required to accompany any planning applications if the site is allocated; these would need to demonstrate that the proposals would not have a severe traffic impact'. Despite this statement, the assessment states issues are 'resolvable', but it doesn't suggest how. As a lay-person I find it very difficult to imagine how any of these junctions could be improved without significant alterations to existing homes and gardens to improve sightlines. This would clearly have significant detrimental implications for those homeowners and the character of the area. Ecology It would be invaluable if the public could have access to the full existing site report produced by the Council's Conservation (Ecology) Section. Clearly the loss of such a large space will have significant impacts which could not possibly be outweighed by the proposed mitigation strategies. The site is currently designated as greenbelt "" if we lose this we will never get it back!!! Open Space I am staggered that the report concludes there is 'no loss/no impact' in relation to the loss of open space. There are numerous, widely-reported, extremely important benefits to having open green space within close proximity of your home (regardless of whether or not it is designated as open space). The site is well-used by local people on a daily basis, playing a vital role in mental health and well-being. Its loss will mean people will have to travel well-beyond walking distance to access any substantial green space. I really do contest the report's assertion that 'there are sufficient alternative natural/semi-natural areas within the catchment of this site'. Certainly there are none within walking distance for anyone under the age of 11 or over the age of 60, nor for anyone who is walking with people of those ages (which I can personally attest to as I have a 4 year old son and aged 60+ parents). Historic environment The report appears wholly inadequate in this respect. Surely the site visit to which it refers should have already been undertaken and well-detailed in the report? Again, there are numerous, widely-reported, extremely important benefits afforded by the historic environment, not least in respect of place-making, cultural identity and the resulting effects on wellbeing. My family has lived in Rastrick since the mid-1800s (in fact one of my ancestors lived in the house above the visible cellar remains at the bottom of Shepherds Thorn Lane) and in my career I have worked on 100s of heritage projects, so I can attest to this. I really do not consider the mental health and wellbeing of Woodhouse residents has been taken into account in this report. The report makes no reference to the historic character of Woodhouse more generally, nor to how the site represents the last, relatively unspoilt, piece of Woodhouse's pastoral past. Neither is there reference to the adjacent approved development in Kirklees, which if combined with LP1451, will create an almost continuous urban environment that merges Brighouse with Huddersfield (save for the M62 and small remaining patch of woodland). This would clearly also have a huge impact on sense of place, identity and wellbeing. Environmental health The report provides negligible information about this. It acknowledges existing concerns about local air quality and that 'the impact of additional road traffic taken cumulatively with other local developments would need to be considered'. It then briefly references the Yorkshire Low Emission Strategy but makes no comment about how this would actually be put into practice or what mitigating benefits it would actually afford. There is no reference to whether or not the current green belt provides mitigation for the M62's local air quality impacts, nor to whether there would be any related impacts if the greenbelt were to be lost to the garden suburb.

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

Duty to Co-operate Reason:

I am not in a position to comment about this.

Suggested Modifications:

The number of new houses on the site needs to be drastically reduced, to a small fraction of that proposed, to ensure the impact on Woodhouse and Brighouse is proportionate to that felt across the whole of Calderdale. The current proposal is simply unfair.

Additional Evidence Link:

Comment ID **APX20**

Site ref (if applicable): **LP1451**

Person ID: **1129577** Name: **Mr Anthony Dolphin** 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?: **No**

Sound Reason:

Are you having a laugh!!! 1250 developments!! More volume of traffic added to an already struggling j24 of M62. Flooding risks. Not enough schools for current residents. No plans for improvement of sewerage works or mains? Increased risk of RTA's. Destruction of green belt and reduction in value of existing property. A sham - who's being paid off in the council!!!!!!!

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 **APX28**

Site ref (if applicable): **LP1451**

Person ID: **1118404** Name: **Mr Andy Speck** 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?: **No**

Sound Reason:

Does not consider the infrastructure requirements

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

Duty to Co-operate Reason:

Suggested Modifications:

reduction in the density to match the infrastructure capacity

Additional Evidence Link:

Comment ID **APX288**

Site ref (if applicable): **LP1451**

Person ID: **1130874**

Name: **Mr David Bradley**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Reasons:- 1 There has been an inadequate involvement of the public on strategy within Brighouse for:-
a.The scale of the development planned is not proportionate - an increase of 31%. b.Woodhouse was never identified but changes have occurred to include it. c.New sites have been added without any consultation - eg. Stratton Road. 2.The Plan is not consistent with National policy and legislation. garden suburb allocation at Woodhouse is not sustainable and contrary to the National Planning Policy Framework. Exceptional circumstances are not justified. 3.Sustainability appraisal is inadequate to justify garden suburb strategy. does not address sustainability of individual sites. discrepancy in Woodhouse Site which is assessed as poor in terms of access.

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

Sound Reason:

Reasons:- Unsustainable growth strategy - garden suburbs:- Disproportionate concentration of new homes in Brighouse - plus significant already approved development over the nearby Kirklees boundary very close to site LP1451. Trend of low housing completions exists in Calderdale - reliance on influx of significant housing sites to reverse trend to such an extent is unrealistic. Timely delivery of necessary infrastructure is exceptionally critical for Brighouse. Not evidenced that required infrastructure will be in place at the time needed - some parts not even committed/planned yet eg M62 24ajunction deemed essential to Brighouse and Bradley/Fixby sites not yet on Highways England plans. Smart Motorway will not relieve capacity Dominance on the car as the chosen travel mode in Brighouse - there is no evidence to show that a change to other modes can be achieved realistically. No evidence to confirm it will prevent either an increase out/in commuting. Forecast increase in car growth with no accompanying high level public transport. No confirmation is given that the traffic census was carried out when Schools were closed or open.. Vision for Garden Suburbs suggests they are no more than 'bolt on' commuter communities- not self contained with only a school in vision. All surrounding GP practices are full as are dental practices. No site by site analysis of green belt release to measure the scale of impact of garden suburbs. Plan seeks to build on 90% green belt and only 10% brownfield. Cumulative effect of concentration in South East is unacceptable due to negative impact on the area. Woodhouse garden Suburb LP1451 and policy SD7. South East strategic vision is inadequate with insufficient technical evidence required for this scale of development at this stage to set the broad parameters for the development - adequate means of access, topography, protection of ecology, noise, health, capacity, early years provision, drainage. Developable area submitted is questioned about this. Discrepancies in housing numbers and densities proposed. There is no scheme or a design for junction 24a on the potential strategic motorway. The main access to the site cannot be satisfactorily planned or provided without this and therefore the release of the site is premature and not suitable in this plan review, if at all. Flooding impact is not quantified on surrounding areas, land will channel runoff down the hill into flood zone 2, the the main railway line to Leeds and Manchester and the river Calder. The start date and and delivery time scales are inflated, only one year for master-planning and four for planning application once the plan is adopted. Research does not back this up. The allocation

is at odds with the Councilsown assessment of the site, which indicates that it is not a suitable location! The Garden Suburb concept is not only at housing, rather the additional benefits it will bring. The site is currently farmed successfully and there is no evidence that this location or the level of benefits exist which would exceed the harm done to the green belt. The site is not a "Garden" Suburb, it is just an extremely large bolt on to a housing estate and school. Green Belt harmed. Evidence to demonstrate the release of green belt is not justified. New houses and affordable (provided) just at standard required on any development and some open space - do not provide benefits that exceed harm to the green belt, heritage, ecology and surrounding community and infrastructure. Identified as most sensitive green belt (4 out of 5 reasons for inclusion) have been incorrectly filled in by the Council which states 3 out of 5. It performs a strategic role but the Council verify it will lead to the merging of towns. Kirklees, the adjoining town have recently approved a site down Bradley Road which reduces this already This only leaves Bradley Wood, a private area owned by the Scouts organisation which has very restricted access (including No Entry signs) and certainly cannot be classed as 'accessible open countryside' and purpose for including land in green belt will be lost. Heritage assets and landscape harmed. Heritage impact assessment restricts the development from parts of the site. Thus no development can take place around Firth House Farm and the access along Firth House Lane to be protected as well as other parts This prevents access throughout the length of the site. Vision for the site would harm the setting of Heritage assets and is not sound nor deliverable. Firth House Lane is shown as being able to be a development area when actually it is to be protected. A 20m buffer from Bradley Wood is not shown on the developable area. Other buffers/protections are not known as there is no technical report and insufficient evidence/justification. Phasing/infrastructure Access from A641 is premature until the new M62 junction details are known. Woodhouse Lane and Daisy road are used as a 'rat run' to avoid the main road entry into Brighouse from Huddersfield and the M62 are already congested, are on drop-off/pick-up points for a school, are very narrow and serve residential properties with exits from and entry to the houses and as a consequence are dangerous and unsafe. The junction of Toothill Bank and Woodhouse Lane are an accident black-spot. Access from Firth House Lane is unacceptable being a single track that needs to be protected in its current form in order to protect the setting of listed buildings. Access from Rycroft Lane is unacceptable/unsafe to support the level of early development being on a blind bend with multiple entrances onto lane. The area is not suitable for construction traffic being residential with on street parking. From Birds Royd there is a bridge over the railway of 7.5 tons. The adjoining Toothill area is being tested for Air Quality Management area - the development will add to emissions with no evidence provided as to impact. Master Planning policy IM7. Support policy to allow involvement of community in garden suburb proposals. This needs to occur early in the process. Should include exemplar levels of design.

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

Duty to Co-operate Reason:

There has been no in-depth analysis of housing needs across the wider area resulting in a raft of 'bolt on estates' due to restrictive green belt. A wider approach should have been looked at collectively across authorities to plan development properly and not to add to already congested areas.

Suggested Modifications:

Suggested Modification. Woodhouse site should be removed from SD7 and retained as green belt. The existing green belt forms defensible boundary. If inspector were to approve then: Early phasing should be removed until such time as main access can be provided from A641. Full Master planning should be undertaken from the start.

Additional Evidence Link:

Comment ID **APX33**

Site ref (if applicable): **LP1451**

Person ID: **1178504** Name: **Mrs Hollie Denby** Organisation:

Agent ID: Name: Organisation:

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 proposed Woodhouse plans are not sound as they do not accommodate any of the below points that will be detailed further: Access Traffic Schooling Noise Green Belt Access. No consideration has been given to access to the site based on plant access as well as once the site is habitable. Woodhouse Lane, Daisy Road and Armitage Avenue are narrow domestic streets with cars often parked on either side of the road due to the ages of the homes built having restricted off road parking. This is currently manageable with the light traffic made by the amount of homes in the area. Any large HGV will not be able to pass through, the weekly bin lorries struggle as does the local farmer and their equipment. Daisy Road for example with cars parked either side becomes in effect, a single carriageway with limited passing points. Residents current and new would have a constant battle each and every day to move and the area would be gridlock. Also on Daisy Road there is a primary school which becomes quite farsical twice a day with parents on the school run. Traffic. The idea to build another access road with traffic lights is laughable to anyone who has used the A641 at any peak time. Queues into and Brighouse from Huddersfield on the A641 often stretch back from the centre up to at least Daisy Road if not back up to Armitage Avenue or beyond. Bradley Bar roundabout at peak hours is currently just about passable but heavy traffic heading down the A6107 towards Cooper Bridge can often bring that round about to a standstill. Adding the additional traffic lights at the Brighouse end of the overpass would be a monstrous waste of time and money on the council's side but would cause gridlock at times over than those not socialable. Also the statement what from the woodhouse site to the station is a 15 minute walk was clearly written by someone who has not walked up and down the steep incline of the A641. This is more true to be double that time. Schooling. Whilst there is a 'plan' for a new primary school within the new plot this wont be completed or even started until all areas are in development so until such time, if half the the site was lived in and habitable, the current school system would feel the strain. The site near Clifton with the secondary school is also a 'potential'. Based on current Offstead inspection reports all local schools were over subscribed in 2017 - both primary and secondary. Where would these extra children school if there was physically no room for them? Noise. The current noise levels from the M62 for those residents currently living on Woodhouse Lane is already on the edge and those living nearer the top, the noise penetrates the homes and can be heard inside with windows closed. The appeal of any new homes built closer to that noise decreases rapidly. Have the fields on the proposed site even been check for decibel levels as I would imagine they would fail any given health and safety requiremest for working nevermind living environments. Green Belt These proposed homes are planned for yet another greenbelt site. This would strip the local area of more areas of respite and diversity for the already struggling ecosystem.

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

Duty to Co-operate Reason:

Suggested Modifications:

A new, brown field site should be found and investigated. This side of Brighouse is too congested and there is no sound plan in place to accommodate the already congested road network. Adding in a new traffic light system to the side of a main arterial route would cause chaos on a daily basis and would grind the area to a halt. The vicinity of the site to the M62 would make any developer nervous about committing their resources as the homes they would want to sell, the people they want to sell to could find a better home in the area without the deafening sound of tyre roar 24 hours a day.

Additional Evidence Link:

Comment ID **APX352**

Site ref (if applicable): **LP1451**

Person ID: **1116208**

Name: **Mrs Carol French Deol**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I am objecting to the local plan from a legal compliance perspective for the following reasons: I have not seen any response to comments submitted on the previous version of this plan during the last consultation process in Summer/Autumn 2017. Nor can I see how the comments previously made have been taken into consideration. Nowhere in these documents, can I find a definition of what is actually meant by a "garden suburb". It is ludicrous to invite comments on a proposal which has no clearly understood definition or meaning. The exceptional circumstances for release of this precious greenbelt land have not been adequately justified by the council. There are other greenbelt sites which have been filtered out of the plan (e.g. LP0869 - close to Bailiff Bridge amenities, good M62 access, bus route etc.) for reasons which seem less significant and which would appear to have less impact on highways than the impact which will be felt by the proposed Woodhouse development. Pre-existing brownfield sites (e.g. LP0573 - Mill Royd) have also been filtered out and are destined to remain derelict eye-sores close to the town centre. Are these sites really less suitable for development than the Woodhouse green belt area? The sustainability appraisal does not justify the garden suburb strategy. Specifically, the Woodhouse site does not score well in relation to access, with the proposed existing roads being unsuitable for volume and nature of traffic concerned. The removal of such greenbelt land surrounding the M62 will undoubtedly have an impact on air quality. How has this been taken into consideration and aligned with environmental targets, which Calderdale is currently failing to meet?

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

Sound Reason:

I am objecting to the local plan from a soundness perspective for the following reasons: Scale of development is disproportionate and unfair. The proposed concentration of new homes in Brighouse is disproportionate with other parts of Calderdale, and taken in conjunction with the proposed housing development just over the boundary in Kirklees, I cannot see how this level of intensity will be sustainable with our existing infrastructure. The proposal would result in increasing Brighouse by more than 30%. Without significant improvements to the roads and town centre amenities, this would not be sustainable. There is no clear evidence that the improved infrastructure will be in place in time to support any such significant housing development. Woodhouse Garden Suburb LP1451 and policy SD7 The SE Strategic Vision is inadequate and does not provide sufficient technical evidence for this scale of development at

this stage (adequate means of access, topography, protection of ecology, noise pollution, health service provision, early years' provision, drainage). Although the SE Strategic Vision highlights the importance of the J24A scheme, there remains some uncertainty about the viability of such a scheme, and therefore the Woodhouse Garden Suburb should also be in question. The site vision is inadequate without a clear way forward for this junction and knowledge of the impact it will have on traffic flow. The additional two proposed access points into the site (Firth House Lane & Ryecroft Lane) are both entirely unsuitable for the volume and nature of traffic required. Recent heritage evidence would prevent the use of one of these routes, and access to both routes from Woodhouse Lane are treacherous at the best of times due to the large numbers of parked vehicles and poor visibility. Loss of Green belt The evidence to justify the release of green belt land is insufficient and unconvincing. New houses, even with the incorporation of some green space, will not be any acceptable replacement for the loss of open countryside. The results would be an unrestricted sprawl, without due separation between the towns of Brighouse and Huddersfield. Bradley Wood would remain as the only separation between urban developments, though this is subject to restricted access. The proposal undermines the purpose of retaining greenbelt land by: Preventing meaningful access to the open countryside for those living in the surrounding urban area Removing opportunities for access to the open countryside for the urban population Removing opportunities for outdoor sport and recreation near urban areas Removing an attractive landscape close to where people live Removing land for agricultural and related uses Removing a wildlife habitat frequented by multiple species including deer, bats, foxes Damage to heritage assets and landscape character The Heritage Impact Assessment (April 2018) restricts development to parts of the site. Notably, the trees, hedgerows and stone walls along Firth House Lane should be retained, and this is not reflected in the council's plan for this site. As a single track lane, this means that it will not provide suitable access into the site. Nor can the main route proposed through the length of the site be viable as it would have to cross over this protected lane resulting in significant harm to this heritage asset. Phasing/Infrastructure delivery The vision for the Woodhouse garden suburb suggests three access points, around which there are numerous concerns and objections: Access from A641 is premature until the new M62 junction details are known Woodhouse lane/ Daisy road are currently used as a rat -run, being very congested and unsafe Toothill bank/ Woodhouse lane is a well-known accident hotspot Access via Firth House lane is unacceptable - single track that needs to be protected in current form to protect setting of listed buildings Access from Ryecroft lane is unacceptable and unsafe to support the proposed level of early development due to the blind bend entrance, and multiple parked vehicles This area is not suitable for construction traffic due to excessive residential, on street parking. The proposed additional development off Stratton Road (LP1000) will add further to the concerns made above, with an additional road junction off Woodhouse Lane, making the area more dangerous for both motorists and pedestrians alike. Air Quality Calderdale is currently failing to meet its Air Quality targets and yet this proposed development plan will add 4000 homes plus employment zones in an air quality management zone. How does the council propose to mitigate the increase in vehicle emissions which will result from this excessive development?

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

Duty to Co-operate Reason:

I do not consider that this plan complies with the Duty to Co-operate. Living close to the border of Calderdale and Kirklees, and having no direct access to the proposed developments for Kirklees, I am very concerned about the lack of transparency and lack of integration of these plans. In particular, I am concerned about the scale of proposed developments on either side of Bradley Woods, and the inevitable impact these will have on traffic congestions around Huddersfield Road/Bradley Bar Roundabout, air quality, infrastructure, services, schools. Without sight or even mention of what is proposed in neighbouring districts, this consultation is not meaningful. The process for "consultation" is far from easy for most people to navigate. The plan itself has not been well publicised, and for those without access to

the internet or e mail accounts, it is very difficult to keep appraised of the status of the plan and to understand how we might have a meaningful way to influence its development. It feels like the council dont really want to make this into a transparent and easy process to solicit comments from the public.

Suggested Modifications:

The local plan should be modified to include: - a more balanced and proportionate distribution of new housing across the Calderdale area, with less dramatic and detrimental impact on Brighouse/Rastrick - a clear definition of what is meant by a garden suburb, what amenities should be provided, how open spaces will be protected, how existing properties will be buffered from the new development - a clear presentation of how and where the necessary infrastructure will be upgraded BEFORE any further housing or employment developments are permitted to progress - a plan for how the air quality targets will be met

Additional Evidence Link:

Comment ID **APX365**

Site ref (if applicable): **LP1451**

Person ID: **954777**

Name: **Av Singh**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I object to the local plan from a legal compliance perspective for the following reasons: Lack of consultation with the local population. EG: many residents in our locality are over 70, some with mobility issues and have no broadband or smart phones to access the internet and the council website to look over the plans let alone submit comments. Whilst every household receives letters for payment of council tax etc why are they not written to about something as major as the local plan? Unless the younger community inform the older residents they don't hear about the plans. Surely the council should be under obligation to include every resident in their communication, not just those who have Broadband / Internet. 4 out of 11 adults living on our Lane have no, or struggle using, the internet. The Calderdale online portal is difficult to navigate and the feedback / response from previous submissions has been non-existent. I've tried locating any type of response to my previous comments and have struggled to do so. New sites have appeared in the draft that have not been previously consulted upon, eg the Stratton Road site, Ref LP1000. The council has not set out the exceptional circumstances that warrant using greenbelt around Woodhouse (LP1451) in preference to the many brownfield sites around the whole borough. This strategy is not sustainable and so is contrary to the FPPF Greenbelt policy.

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

Sound Reason:

I object to the local from a soundness perspective for the following reasons: Why has Brighouse got the lions share of the proposed locations? A disproportionate amount of housing is proposed for Woodhouse & Clifton locations compared to the rest of the borough. Why should Brighouse receive almost 50% of all new housing and employment zone development whilst the rest of the upper valley area not? I suspect many of the current council live over that way and it's a case of 'not in my area' Lack of Highways infrastructure, maybe the councillors who voted these plans through should move to Brighouse for a week, see how they manage the traffic issues. The traffic is horrendous at best and a nightmare when the M62 is regularly closed due to accidents or suicides from bridge (eg 13/9/18). Lack of other infrastructure "" which

reservoir will supply fresh water to the new developments? How will this affect the Rivers? Lack of broadband infrastructure "" The current copper infrastructure is inadequate for today's requirements; internet speeds can be down to 1mbps during peak times and weekends. How is this being addressed as it will only get worse by the time the developments happen. The UK has slipped to 35th place in an annual league table of global broadband speeds, putting it in the bottom third of EU countries and below the likes of Madagascar and Bulgaria! The lack of consultation about the impact of the Kirklees development that will back onto the Woodhouse / Rastrick proposed site (LP1451) creating urban sprawl and further exacerbate the Highways infrastructure issues previously highlighted. The affects of additional carbon emissions on the Ancient woodland and wildlife at Bradley Wood Scout Camp. How is the current wildlife going to be catered for? There are deer, foxes, pheasants, green finch, pipistrelle bats and much more in the LP1451 site and in the hedgerows that divide the rich farmland. We currently also have hundreds of Canada Geese visiting in early Autumn each year. What systems or procedures are proposed to be in place to combat the air quality issues that are prevalent in the Brighouse, Kirklees and Bradford areas, specifically around J25 of the M62? Lack of plans that future proof highways infrastructure and Accident blackspots at junctions such as Toothill, Woodhouse Lane and Huddersfield Road to be in place before construction begins. Access to LP1451 site is a non starter, Ryecroft lane is a small, narrow lane which has cars parked on the road. This lane connects with Woodhouse Lane on a particularly bad bend with poor visibility. There is no way a housing estate could use this lane as access. Firth House Lane is already earmarked as unsuitable by the heritage report due to hedgerows etc having to be preserved. LP1000 site would also access Woodhouse Lane at the point of the bad bend. How is the traffic from the industrial estate at the end of Birds Royd Lane / Woodhouse Lane going to be managed? Much of the traffic travelling up & down Woodhouse Lane services this estate, vehicles include LGVs and HGV's taking shortcuts when the M62 is misbehaving. Why is the proposed CIL for Brighouse/Rastrick so much lower than elsewhere in Calderdale? I am specifically concerned about the Garden Suburb proposals and the significant infrastructure improvements which would be needed to sustain such large developments and influx of traffic, in addition to the increased need for schools, health services, utilities, recreation areas etc. If the CIL is set low, how will the necessary infrastructure be provided and where is the justification for such a low level?

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

Duty to Co-operate Reason:

I do not consider that this plan complies with the Duty to Co-operate: Living close to the border of Calderdale & Kirklees, and having no direct access to the proposed developments for Kirklees, I am very concerned about the lack of transparency and lack of integration of these plans. In particular, I am concerned about the scale of proposed developments on either side of Bradley Woods, together with this proposed employment site (LP1618), and the inevitable impact these will have on traffic congestions around Huddersfield Road/Bradley Bar Roundabout, air quality, infrastructure, services, schools. Without sight or even mention of what is proposed in neighbouring districts, this consultation is not meaningful. The process for "consultation" is far from easy for most people to navigate. The plan itself has not been well publicised, and for those without access to the internet or e mail accounts, it is very difficult to keep apprised of the status of the plan and to understand how we might have a meaningful way to influence its development. It feels like the council don't really want to make this into a transparent and easy process to solicit comments from the public. Lack of consultation with the local population. EG: many residents in our locality are over 70, some with mobility issues and have no broadband or smart phones to access the internet and the council website to look over the plans let alone submit comments. Whilst every household receives letters for payment of council tax etc why are they not written to about something as major as the local plan? Unless the younger community inform the older residents they don't hear about the plans. Surely the council should be under obligation to include every resident in their communication, not just those who have Broadband / Internet. 4 out of 11 adults living on our Lane have no, or struggle

using, the internet.

Suggested Modifications:

The local plan should be modified to include: a more balanced and proportionate distribution of new housing across the Calderdale area, with less dramatic and detrimental impact on Brighouse/Rastrick a clear definition of what is meant by a garden suburb, what amenities should be provided, how open spaces will be protected, how existing properties will be buffered from the new development a clear presentation of how and where all the necessary infrastructure will be upgraded BEFORE any further housing or employment developments are permitted to progress a plan for how the air quality targets will be met a clear plan for protection of wildlife in and around the zone

Additional Evidence Link:

Comment ID **APX366**

Site ref (if applicable): **LP1451**

Person ID: **1181867**

Name: **Mr Ian Costigan**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Please see comments below.

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

Sound Reason:

Summary I believe that the development of the large garden superb at LP1451 will be wholly negative for the current residents of Woodhouse, Rastrick and Brighouse, especially when combined with the other proposed garden suburb and enterprize zone. I will detail my reasons for this below. I will try to address my points using the local plan consultation documents' headings. Open Space I was attracted to Brighouse as a place to live precisely because of the greenbelt that this plan proposes to remove. I came from inner-city Leeds where green space was very difficult to come by and a drive was required to access country-style walks. The LP1451 site currently provides fantastic walks and open space, which has huge impact on the mental health of both myself and my wife and son. The proposals remove this, and as a result the whole of Rastrick will be the poorer for it. We would once again need a car to get to what is currently on our doorstep. Brighouse would become a generic part of the urban sprawl and it would lose its allure. The plan states there is, 'no loss/no impact'. This is not true, there are no other options, especially when we consider other plans to remove green belt land in adjoining areas. Land drainage and flooding I have read the report on this and the findings seem very vague and provide no concrete information for local people to make informed comments about. It seems to me that the report makes assumptions about the site; I find it amazing that this hasn't been further investigated by this point. Roads I am a commuter, and as such can comment on the existing infrastructure serving the area based on my own experiences. The roads through Brighouse to junction 25 (the junction earmarked by the report to serve the proposed site) are already extremely busy and often lead to large queues down Huddersfield Road. This is on a normal day with no problems. On problematic days it can take 20-30 minutes just to make it to the motorway. The amount of extra traffic produced by 1,200+ houses would make it even worse and there are no plans to make this any better. The proposals by the highway's agency could take until 2030 to come to fruition and none would directly improve the traffic through the site. A new junction 24a isn't even being considered at the time

and I am surprised that the report even mentions it. I am a Woodhouse resident, with family who live off one of the proposed entrance roads (Daisy Road) and my family use Woodhouse Primary School. We also use Birds Royd regularly which would be another proposed access road to the site. They both have large queues already leading to Huddersfield Road. The number of extra cars generated by the proposed site would lead to gridlock in the area, making it very difficult to access the school at rush hour and for commuters to get to major roads. Daisy Road particularly is a very difficult and often dangerous junction to use with poor visibility and regular accidents. I believe adding extra traffic to this road would lead to further problems. I don't think that the plan adequately considers the extreme impact LP1451 would have on the road network. Facilities Looking at the plans for site there doesn't appear to be enough space for a new school and medical practice, in addition to the high number of homes and gardens proposed. This is staggering. The local GP practices are already close to capacity and couldn't cope with the extra demand the site would create. The local school in Woodhouse is already close to capacity. I fail to see how this number of houses could be accommodated. There is a lot made of another site (enterprise zone) providing work for the area but I understand that the plan is to move existing warehouses to the site, which will obviously bring with them their own staff and as a result will not produce many new local jobs. I fail to see this attracting people to this new suburb.

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

Duty to Co-operate Reason:

There are current plans in Kirklees that are extremely close to this site, with very little green belt separating them. This will create urban sprawl, blurring the boundaries between Brighouse and Huddersfield. The site report does not even mention this and therefore does not consider the already large amount of extra pressure the local area will be under from the Kirklees site. This is a big failure of the Calderdale plan.

Suggested Modifications:

Overall/Modifications This level of development in one small part of Calderdale is entirely disproportionate. It will place unacceptable strain on the town when other areas in the large geographical area of Calderdale can offer similar areas to spread out the development. I understand that houses do have to be built, however the sheer scale is unacceptable in one small area. If all schemes go ahead as planned, Brighouse's population will increase by 30% without the infrastructure changes required to support it. I believe my town/area could not cope with this proposal in its current size.

Additional Evidence Link:

Comment ID **APX374**

Site ref (if applicable): **LP1451**

Person ID: **959043**

Name: **Mrs Sally Maden**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

As a household with a young family with children under the age of 5 I have objected many times in the past regarding the local plan commenting on areas such as overcrowding, lack of infrastructure etc. Since we are this time expected to comment regarding Regulation 19 I feel this makes it significantly more difficult for an average family to comment confidently, I have therefore come together with the Woodhouse local

community sharing best practise and sourcing knowledge from others who are more au-fait with the consultation process, nevertheless I still feel my previous comments are wholly relevant (the fact I have not received a response to my comments within Regulation 18 suggests the council is not being procedurally correct and has therefore shown a failure to consult with the local community) and I am steadfast in my view this plan is untenable from all perspectives. I therefore object to the local plan for each of the following reasons from a legal standpoint :

Inadequate public involvement Given the scale of development proposed for Brighouse (increasing its size by 31%) the scale of involvement would not seem proportionate to the scale of development planned for the town. Furthermore, the strategy has changed throughout the plan without adequate community involvement. Woodhouse garden suburb was not originally included providing no opportunity for early consultation in the process to enable input on such a significant proposal. There has been no community involvement in the development of the overall vision and it is unclear whether stakeholders have been involved in the development of the vision for the site to create transparency in process. In addition, there are certainly new sites that have appeared in the publication draft that have not previously been consulted on in previous iterations of the plan ie Stratton Road site for 24 units (ref LP1000).

Consistency with National Policy and Legislation The garden suburb strategy chosen by the council is not sustainable and is therefore contrary to NPPF - greenbelt policy. Additionally, the Council has not clearly set out the exceptional circumstances that warrant the release of Garden suburb area at individual sites such as Woodhouse Sustainability appraisal A sustainability appraisal has been undertaken but it does not adequately assess the sustainability of individual sites. There are discrepancies within this "" Woodhouse site scores poorly in terms of access. This questions the validity of the garden suburb policy which indicates that these are sustainable.

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

Sound Reason:

The plan is 'Unsound' for the following reasons:-

i) **Unsustainable Growth Strategy** The need to provide new homes to meet identified need is not disputed although without detailed expertise in this field it is difficult to know whether the Strategic Housing Needs Assessment is of course sound. Housing needs to be provided in the right location and of the right type to meet identified need which I assume the Inspector will check. Can the Council provide evidence that there is a significant, disproportionate need for new homes in Brighouse? Housing completions within Calderdale have remained very low over the last few years when compared to the other Leeds City Region authorities. The housing delivery strategy taken relies on a dramatic increase in land supply as the principal mechanism to deliver growth in housing completions. Given current delivery this would not appear to be realistic as it relies on the expectation that a sudden influx of additional, greenfield sites into the land supply will result in rapid acceleration in housebuilding to reverse long-term trends. The Council should evidence clearly how this is realistic. There is insufficient evidence/justification that the strategy to focus significant housing and employment growth in the south east would be a sustainable pattern of development. Regionally, the Leeds City Region Strategic Economic Plan does not even identify Brighouse as a housing growth area but rather focuses growth on Halifax for Calderdale "" so why has this been chosen for the bulk of housing growth? The strategy for delivery will result in the over development of Brighouse. The town will take a third of all new development, increasing its size by almost 32% stretching already creaking infrastructure - which is unsustainable. The timely delivery of necessary infrastructure is an important matter for any local plan. In this case, with the substantial growth around Brighouse, it is an exceptionally critical issue. Significant concern is raised about the ability for necessary infrastructure to be in place at the point needed and whether it will be sufficient and not worsen the current issues that exist. The transport evidence base indicates that Brighouse already suffers from high gross commuting levels. 70% of people work outside the town travelling to Halifax and the surrounding authorities. The car is the dominant mode for all movements in the town. It is suggested that the WYTP and Highways England transport improvements proposed can provide some mitigation to existing constraints and the level of development proposed and support more sustainable modes of travel.

Whilst the promotion of a modal shift from the car is supported it is unclear how this will be achieved in reality. The plan provides insufficient clarity that the infrastructure required to support the significant growth will come forward at all or in a timely fashion. Some improvements required are not even planned or committed in the relevant transport programmes yet and those that are subject to slippage. Notably the M62 J24a junction (which has been identified as essential to meet the growth needs not only of Brighouse but also the recently approved Kirklees' sites at Bradley/Fixby) is not currently in Highway England plans. The council should provide evidence to demonstrate/ confirm with some certainty that highways infrastructure will come forward to demonstrate adequately that development growth is sustainable (ie can the modal shift from cars to other modes be substantiated and can be delivered in the proposed timeframe in these locations. Justification for removal of the Brighouse Garden Suburbs from highly sensitive green belt is made on the basis they provide sustainable locations for development. Although significantly the Woodhouse site (LP1451) was originally discounted on the grounds of green belt /sustainability early in the process. If the Calderdale Plan is to meet both its employment aspirations and its aims to reduce transport-related carbon emissions, then there must be convincing evidence that the house building strategy WILL significantly reduce in-commuting, and not increase out-commuting which appears to be the case. Policy SD2 sets out good development tests to support Calderdale's greenhouse gas reduction targets. However this is at odds with the significant proportion of growth that would be focused on 'Garden Suburbs' that depend on 'enhanced infrastructure provision' and are accompanied by a forecast 'increase in car growth'. Urban extensions and new settlements can only be considered sustainable if they have exceptional levels of public transport accessibility "" in which case they would also be expected to deliver high residential densities and a mix of uses. The evidence does not suggest this is the case and the Garden Suburb proposals appear recklessly unsustainable. There is no evidence to confirm the garden suburbs will be self contained, sustainable communities in accordance with the government's expectations for garden communities. Certainly within the Woodhouse LP1451 site the vision provides nothing more than a primary school to cater for the new housing development. The site will be no more than a large commuter settlement which has been allocated on the basis of its location close to a main transport route and which will add to the already overburdened infrastructure and capacity of Brighouse. The plan justifies the allocation of sites in more strongly-performing Green Belt parcels, such as at Woodhouse, without a site-by-site analysis so it is not apparent what the scale of this impact is on the purposes of the Green Belt. Any justification of exceptional circumstances for taking land out of the Green belt must show, on the one hand, that doing so will realistically and sustainably deliver the intended scale of development; and on the other hand, that the degree of impact on the purposes of the Green Belt will not be unacceptable. This has not been properly evidenced within the strategy. The council need to demonstrate this. Modification "" The plan should be amended to reflect a more proportionate, sustainable spread of development to support Calderdale's housing needs reducing the over development of Brighouse. ii). Woodhouse Garden Suburb site LP1451 and policy SD7 The Council's SE Strategic Vision is inadequate and does not provide sufficient technical evidence to support a satisfactory framework to support development of the Woodhouse garden suburb site at this stage. The SE Strategic Vision highlights the strategic importance of the J24A scheme and proposes the main access into the Woodhouse site from the A641 will not be implemented until there is greater certainty about the future of M62 J24A. This junction scheme is currently not even identified in the Highways England plan. Kirklees' evidence specifically indicates that the J24A junction provides key transport mitigation to assist delivery of their sites around Bradley/Fixby area and adjoining authority development growth. Calderdale's also indicates that delivery of a new motorway junction would 'affect the distribution of traffic across the local road network, and would potentially influence the scope and location of measures that are required as part of the A641 scheme'. It is clear therefore that if this does not go ahead or is delayed there will be an impact on the existing road infrastructure and potential design and layout of the proposed garden suburb. The site vision is inadequate without a clear design for this junction and knowledge of the impact it will have on the development. A further two potential access points have been suggested in the vision from which to gain access for early development but evidence has not been provided to verify their suitability. The residential

highways network is not suitable to accept either the level of development proposed or the associated construction traffic and recent heritage evidence prevents access from one route. Since access cannot be satisfactorily provided or planned, the inspector is urged to consider whether development of the Woodhouse garden suburb is premature for this plan review pending confirmation of the design and impact of the M62 24a strategic highway junction improvement scheme. It is encouraging to see the need to undertake a full master planning process (policy IM7) to inform any planning application and secure planning approval - but this is not something that happens overnight. Evidence from other garden suburb proposals around the country and TCPA research indicates that it can take up to 10 years or more from adoption of a plan to achieve this "" detailed master planning cannot start until the plan is adopted in 2020 and this could mean development may not actually start until around 2030 in reality. Deliverability of the strategy is therefore questionable within timeframe outlined. The council has based delivery on Lichfield's research. They have allowed a build out rate of 140, 1 year for master planning and 4 years to achieve outline planning of the whole site. However, the research indicates that for sites of up to 1499 in size an average build out rate of 122 can be expected. It also indicates 6.6 years on average for planning approval ""that is without factoring in any detailed master planning. Therefore start date and delivery timescales within the plan are considered heavily inflated and unrealistic as currently proposed and need to be reviewed for accuracy.

Sustainability The proposed land use distribution is not sustainable. Specific assessment of the Woodhouse site -LP1451 suggests it is not a sustainable allocation, weakening the green belt and creating an urbanising effect. The Council admits in its own site assessment that the site does not score particularly well in accessibility terms but this seems to have been ignored on the basis this can be mitigated with on-site provision. Thankfully Policy IM7 requires a master plan for the garden suburb to be developed with the community, including provision of appropriate infrastructure "" however worryingly within the vision, which sets the framework for development of the site, there is nothing proposed other than a primary school since the existing school is at capacity. Furthermore the vision is not accompanied by the necessary level of evidence or technical study required to set the broad parameters for the required development that should be expected at this stage of the process to support the scheme "" adequate means of access/ topographical/ecology/ health/ early years provision/drainage. This raises strong concerns about the sustainability of the site and how the scheme will create a sustainable community. If other facilities/ constraints are to be accommodated at a later date this will more than likely reduce the developable area and expected housing delivery numbers. Whilst badged as a 'garden-suburb', the site appears no more than a 'bolt-on' estate on the edge of Brighouse without sufficient infrastructure to create a sustainable self-contained garden community. The economic or social benefits of the proposed development are not at all convincingly argued and there would be clear environmental harm. The government is clear that justification for garden community green belt release is not just about housing but the additional benefits that this will bring. In this case it appears the uses are generated by the development rather than vice versa ie new primary school. Affordable housing is only proposed at the level expected for this particular market area "" so no additional benefit in this respect either. Policy IM7 refers to infrastructure but this is not included in the vision! TCPA's assessment of garden communities indicates that this type of 'bolt on' development can in fact encourage increased car use creating no more than a dormitory suburb without economic or community infrastructure built in. The likelihood is that car use will continue to dominate in this location. Walking distances specified in the vision are under represented 15m to railway station and 20 to town centre presumably because the distance has been measured as the crow flies (1.5km to the town centre) In reality it takes this to get from outside the site if you are an able, quick walker and the up hill journey back is much slower! The council need to clearly set out why this location and what local level exceptional circumstances exist to justify how the benefits exceed the harm to green belt.

Modification If this is a 'garden' suburb as we are led to believe, the council should sign up to garden city principles to deliver and incorporate these standards into the master planning policy IM7 to ensure sustainable outcomes are achieved.

Green Belt The evidence provided to release green belt land at Woodhouse LP1451 for a garden suburb is not robust, credible or justified. There will be benefits in terms of affordable housing provision (but this follows the standard policy expected within this locality and does not

provide additional benefit) and contribution of homes to meet housing needs. Whilst open space will be provided within the site this is at the expense of the access to open countryside that is currently available and will be lost. These benefits do not exceed the harm to green belt, heritage and ecology of the site and negative impact on the surrounding existing community and infrastructure. The Council identifies Woodhouse garden suburb "“ LP1451 as most sensitive green belt in their evidence "“ performing 4 of the 5 reasons for inclusion. The green belt site survey form specifies categorically the site WOULD - potentially lead to ribbon development with a high potential for unrestricted sprawl - lead to the coalescence of towns. - not safeguard the countryside from encroachment - harm some heritage assets Contrary to this in their 'duty to co-operate' statement, the council then specify that the reduced gap is acceptable and would not lead to coalescence! It is clear this site is located within an area of green belt that performs the key strategic role of preventing the further merger of Kirklees with Calderdale. Green belt land to the south (within Kirklees boundary) was recently accepted for release for an urban extension by the Kirklees local plan inspector in July 2018 which already lessens the gap significantly and makes it even more important to retain and protect the role of the remaining green belt land in a meaningful manner. The removal of this site would further reduce the open gap between Kirklees and Calderdale contributing to the merger of the two settlements "“ especially along the Huddersfield Road frontage where the proposed M62 Junc 24a (currently identified as critical in both the Kirklees and Calderdale's plans for the delivery of the raft of large housing sites within the area "“ although worryingly NOT in Highways England plans yet and no detailed design) is planned to go. This would result in continuous urban built form along this main road corridor. The remaining area proposed would largely only leave Bradley Wood in isolation. The majority of Bradley Wood is not open for general access as it is home to the West Yorkshire County Scout Camp and Activity Centre. In the spirit of the green belt, this limited access would not represent 'accessible open countryside'. The proposal would undermine the purpose of including land in the greenbelt by:- - preventing meaningful access to the open countryside for those living in the surrounding urban area - removing opportunities for access to the open countryside for the urban population; - removing opportunities for outdoor sport and outdoor recreation near urban areas; - removing an attractive landscape near to where people live - removing land in agricultural and related uses Furthermore figs 27 and 28 of the infrastructure delivery plan do not categorically show good accessibility to natural and semi natural land within the existing residential or proposed site area (although the map is not easy to see at the scale provided). The green belt currently provides this opportunity but would be eroded by the proposal. Whilst the garden suburb will integrate areas of open space the council needs to evidence how this will be more positive than the open access and opportunities that the site currently offers for leisure/recreation. The garden suburb would encroach on the openness and permanence of the green belt removing open land which would harm the landscape character of the area which critically forms the setting of the ancient Bradley Wood and listed heritage assets at Firth House Farm (which lie within a central position within the proposed site). The landscape character of the site (rural fringe) is of significant merit and quality as indicted in the evidence, visible from a distance when viewed from the surroundings. With narrow rural lanes and footpaths, hedgerows, infield trees and Firth House Farm hamlet it is indicated as having a strong rural character "“ the historic field structure remains intact and the land continues to be used as effective farm land. The settings of Heritage Assets Heritage England note that the group of listed buildings at Firth House lie within an open rural landscape, likely to have remained relatively unchanged, and therefore greatly contributing to their historic setting and enhancing the buildings' significance. A Heritage Impact Assessment has now been carried out following these comments (April 2018) although this is not reflected in the submitted vision and it is clear that there will be major harm to the settings of three listed buildings and other heritage assets without significant changes to the vision including restrictions/reductions on the proposed development. There are significant areas where no development should take place at all and areas where development should be restricted. Notably the trees, hedgerow and stone walls along Firth House Lane should be retained and enhanced. The council has NOT reflected this in the developable area at Appendix 1 site allocations (developable area). As a single track this means it does not provide a suitable access into the site in its current form as proposed in the vision. Even if it did,

it is constrained by development at the entrance onto Woodhouse Lane. This restriction critically means the main arterial route proposed through the length of the site to serve development would not be acceptable either as it would have to puncture the lane resulting in significant harm to this heritage asset. Therefore the site allocation is contrary to NPPF as the vision for the site would cause harm to the significance and setting of the buildings at Firth House Farm as heritage assets and it can be concluded that the masterplan vision for the site is NOT deliverable or sound. Additionally, the masterplan strategic vision also fails to provide further technical information needed to determine the impact on the scale and form of development, the developable area or how it meets 'garden city' principles :- - Motorway noise "" what is the impact/buffers need to be defined? - land contamination? - non mains drainage? - impact on Brighouse AQMA and the impact on air quality and designation as an AQMA at Toothill which is currently being monitored for traffic pollution. - Ecological survey and impact on the wildlife corridor and ancient woodland - Requirements for health service provision and early years provision As such there is no clear framework to justify the development as proposed. Phasing/ infrastructure delivery A further two potential access points have been defined on the vision map from which to gain access for early development but these are unsuitable to accept either the level of development proposed or the associated construction traffic that will be generated for an early 330 homes. Government guidance (prospectus) on the delivery of garden communities indicates it is necessary to ensure that development does not have an unacceptable detrimental impact on existing local residents and the surrounding area by securing the necessary infrastructure, services and community facilities at the appropriate stage in the development process. The vision for the Woodhouse garden suburb suggests three access points. The main one from the A641 Huddersfield Road and then two from the existing Woodhouse residential area from Firth House Lane and Ryecroft Lane. The A641 can be dismissed as unsuitable for the reasons previously given "" prematurity and affect on the heritage value of Firth House Lane. It also has potential to impact on the Gatehouse at the top of Woodhouse Lane which requires a buffer to provide protection to its boundary (see Heritage Impact Assessment). Both the other access points which are suggested for early development are also unsuitable and, as identified in the vision, are likely to require third party land. They are located within a residential area which already suffers from high levels of on street parking (referred to in the vision) which limits access to single passing points throughout the area at all times. The area is a 20mph zone and Woodhouse Primary School located off Daisy Road also results in significant traffic movements at school start and finish times and beyond. This extends down to the Daisy Road park and the junction with Woodhouse Lane. Woodhouse Lane is also used as a rat run to avoid queuing traffic on the main A641 into Brighouse. In addition to the above, following the Heritage Impact Assessment, the single track Firth House Lane is now confirmed as being unsuitable to provide access to residential development since it needs to be retained in its current form without damage to the hedges and trees which bound it to retain the setting of the listed buildings at Firth House Farm. In terms of Ryecroft Lane, this access is also unsuitable for construction or significant levels of traffic. The 330 homes proposed for early development would result in an expected 528 cars at an average of 1.6/property which is conservative figure. The lane is accessed from a blind bend on Woodhouse Lane. On street parking occurs from the blind bend (from 6 to 20 Woodhouse Lane) to Daisy Road park at all times creating a single road where cars regularly have to reverse as they come round the corner due to severe, poor visibility. Access to the rear of 6-20 Woodhouse Lane and maintenance to the park is directly opposite the lane access. Access up Ryecroft Lane is also restricted by on street parking/ single pass points, as well as cars reversing into the road to exit from a number of driveways which makes it unsafe for construction traffic or the scale of development proposed. Site LP1000 is also allocated within the plan for 24 homes off Stratton Road/ Woodhouse Lane. This requires a new access point to be created in close proximity to the Ryecroft bend. This is programmed to start prior to the start of the garden suburb. It would create a further junction onto Woodhouse Lane a few meters from Ryecroft Lane adding to safety, access and capacity issues that already exist in this location. Accessing the site from Birds Royd Lane would not be acceptable for construction traffic due to the weight restriction on the railway bridge limiting vehicles to 750t. Modification Policy SD7 "" Woodhouse Site LP1451 should be removed as a garden suburb housing site and retained as green belt. The designation is

premature pending details of the strategic M62 24a junction proposal. It is contrary to NPPF in that it would not represent sustainable development and exceptional circumstances to remove the site from green belt have not been demonstrated or justified. The proposed vision is not deliverable "" access is not suitable, development as envisaged would impact on heritage and ecology assets and have a detrimental impact on the surrounding residential area. The existing green belt boundary forms a clear, defensible boundary following the extent of development down Woodhouse Lane and Ryecroft Lane (where the historic settlement of Upper Woodhouse remains with a row of former farm worker cottages and converted barns). This remains the most appropriate line for the extent of development. Appendix 1 should be amended to correctly show all areas where development is to be restricted on the site as a result of current Heritage Impact Assessment. This needs to be updated with further critical technical studies that have not yet been provided. In the event the inspector is minded to accept the suburb proposal, a detailed masterplan for the whole site should be in place for the whole site as indicated in IM7 and worked up with the community. However, the early phasing of development from Firth House Lane and Ryecroft Lane should be removed until a route from the A641 can be provided to service the site to protect the existing residential area since the road network and access points are unsuitable to accommodate the construction vehicles and the level of development. Policy IM7 The policy requiring preparation of a detailed masterplan allowing the involvement of local community in the development of large scale developments is supported and is vital if the Woodhouse garden suburb is approved to proceed. Community involvement should be required early in the process and ideally during the preparation of the vision to develop transparency. There has been no involvement in the shaping of the vision for the Woodhouse site in this respect. If the Council is supporting the development of 'garden' communities then there should also be a requirement to make sure these are developed to the high standards and 'garden city principles' expected from such schemes. Modification The policy be amended to include 'garden city' principles for garden suburb proposals to ensure the schemes integrate exemplar levels of design and sustainability and early community involvement including the preparation of an engagement strategy.

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

Duty to Co-operate Reason:

The council appear to show they have met the 'duty to co-operate'. However, it is reported and evident that green belt is a key strategic constraint on delivering housing needs across West Yorkshire and specifically in Kirklees and Calderdale. However, there appears to have been no in-depth analysis of the issues facing local planning authorities in this respect. There is reference that this will potentially start in the next plan making period. In the meantime, each local authority has focused inwardly and turned to green belt release to achieve their own individual housing numbers. This has resulted in a number of large 'bolt on estates' to settlements in Brighouse and Kirklees which will create significant areas of overdevelopment and overload existing infrastructure rather than sustainable development. Whilst it is accepted that individual authorities are at different timescales in their delivery plans, the 'duty to co-operate' should have looked at this as an alternative strategy to plan development in a more sustainable way. A larger than locally led approach could provide a more sustainable option with a properly planned new garden village with sufficient room for expansion and the ability to achieve a self contained and sustainable community in the right location. Clearly these are hard decisions to make and would have implications on green belt. This has not been assessed to support the housing market. Instead we are left with a strategy that will overload the current infrastructure and in the case of Woodhouse' a proposal that will not in anyway make a 'positive impact' for the community or location.

Suggested Modifications:

See earlier comments

Additional Evidence Link:

Comment ID **APX379**

Site ref (if applicable): **LP1451**

Person ID: **954839**

Name: **Anthony M Brook**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

There is insufficient information provided as to supporting infrastructure and there seems to be no clear indication of the size of the development. The numbers indicated do not take into account the space that will be left around the Grade II listed buildings of Firth House Farm, there has been mention of a School where will this be built and there are no details of the major access roads to the site from J25 of the M62 across the River Calder and the Canal.

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

Sound Reason:

The present infrastructure is simply at full capacity and is creating dangerous levels of pollution in the Brighthouse area, particularly in the Wakefield Rd area and an assessment is being undertaken in the Toothill Area at present. The planned development will increase the number of vehicles in these areas by in the region of 9000 per day. Without clear and detailed infrastructure plans on how the Council intend to overcome and reduce the pollution levels, plus indicating where new Schools and Medical facilities are going to be built this plan is not fit for purpose.

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

Duty to Co-operate Reason:

The views of the Residents of the Woodhouse Area have been totally ignored along with there Councillors.

Suggested Modifications:

Clear and detailed plans for the proposed infrastructure that will reduce the current levels of air pollution in the Brighthouse area whilst reducing the virtual gridlock that already occurs on a regular basis in the town. A third river and canal crossing is required with the road coming straight of J25 of the M62, or alternatively a new Junction 24a off the M62. Clear details of Schools and Medical Facilities (Doctors Surgeries) are required and exact details of how the Council plan to protect the Grade II listed building/s at Firth House Farm.

Additional Evidence Link:

Comment ID **APX392**

Site ref (if applicable): **LP1451**

Person ID: **1182400**

Name: **Ms Caroline Simpson**

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 am writing to you to voice my concerns about the 1,257 houses planned to be build between Woodhouse Lane and Bradley woods. Brighthouse is an amazing town, it is friendly and close to other surrounding towns and cities. Where I am located (152 Woodhouse Lane), the fields in front of my house are prefect for getting away from day to day life and a chance to see wild animals in their natural habitat. As I am an animal lover myself and did study Animal management at college, I understand the importance of them having a home that is undisturbed or untouched by humans. By building these 1,257 houses, it will not only disturb their homes but also decline their numbers drastically. Me, my family and all my neighbours walk through these fields once or if not twice a day and see so many native animals such as Batts, Deer, Hedgehog, birds of prey and Rabbit. Others such as minks and signs of life we don't normally see like badgers and foxes. I believe not only is it educational and exciting to see wild animals, but I think they should be left untouched as some of the rabbit burrows have been there since I can remember!

Furthermore, next to the plot where the council is planning to build is Bradley woods. This area of land is beautiful, educational and lets young children, be children. I remember when I was in year 7 I went up for a socialising day to get to know everyone. It is tranquil for an activity place and so close to the motor way and town centre. By building these houses, not only will Bradley wood Scout camp begin to get fuller, but this increase littering and possible fly tipping, a more unsafe environment as anybody can walk through, the road going down into the woods would be so congested, making it unsafe for children, dog walkers and again, the animals. Part of Bradley woods is used for courses such as the Duke of Edinburgh award and basic orienteering. The fields surrounding it are used for these activities, but with the new planned houses it would not be possible. My next concern is the schools. I attended Woodhouse Primary and absolutely loved it and would find it devastating after all the hard work of modernising it and extending it would go to waste if a larger school was built. Not only that, if Woodhouse was to stay open, more students would attend, pushing the school to its capacity. After all, education and meeting the needs of the students is the most important part and do you think they will get that? This moves onto my next and final point. Traffic is a huge problem around the Woodhouse area anyway. When I walk to the train station or even to work on a week day, parents or guardians park so close to the school that there is no room for them to move in their cars, never mind pedestrians. Adding this up PLUS another 1,299 homes around the woodhouse area, all setting off at that similar time in the morning will be mayhem. Speed limits have been set to 20mph, which, quite frankly, nobody sticks to. Even when Woodhouse primary is finishing, parents and other vehicle uses exceed the limit. Again, making it unsafe for walkers, children and parents. By building another 1,257 houses, Woodhouse lane on a morning and evening will be largely over used. Along with this, people that use Birds Royd Lane as a short cut to miss the traffic both ways from Brighthouse and at the top of Woodhouse lane will get caught up in it making Brighthouse even harder to get through than it is now. Not only that but the pollution will be mega. Over all, I do not agree with building these houses. I think the cost on the environment is too great to even consider the benefits of it which would be: more jobs and more income to Brighthouse as a town. But when will the building stop? Everywhere you look there is new houses being constantly built, there needs to be change and leave areas green and untouched! Brighthouse cannot handle another 1,257 families in Woodhouse or 24 on Stratton road which will add to the problem. I hope you take this letter into consideration and really think about the impact it will have on all our lives.

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 **APX41**

Site ref (if applicable): **LP1451**

Person ID: **1178931**

Name: **Pamela Wade**

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 is a complaint regarding planning permissions for building 1257 homes between Woodhouse Lane and Bradley Wood. I really don't know where to start but here goes! First I have concerns about the infrastructure there are not enough Doctors surgeries, Schools are busting at the seams and there will be a shortage of open green areas to see and enjoy! The only bit of greenery that we do have will be turned into a concrete jungle. What a travesty The traffic around and through Brighthouse is almost at a standstill now so goodness knows what it will be like if all these planning applications are accepted! The traffic will come to a halt. If the access to the new estate is going to be in Woodhouse Lane well that is ludicrous there I not enough space for any more cars it's a rat run at the moment so having more cars using this road would be absolutely crazy. I feel along with many others extremely upset and angry especially with Calderdale planning department for even considering this area for development, how about considering people's quality of life! We moved into this area because of the surrounding countryside if these plans are past it will no longer be an area I would choose to live in. One very disgruntled home owner

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 **APX460**

Site ref (if applicable): **LP1451**

Person ID: **1182434**

Name: **Mr Michael Walker**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Inadequate public involvement on strategy within Brighouse for the scale of development planned a 31% increase, not proportionate to the scale of development planned for the town. Also this would increase the population of Brighouse quite considerably The strategy has changed throughout the plan without adequate community involvement. Woodhouse garden suburb was not originally included providing no opportunity for early consultation in the process to enable input on such a significant proposal. There has been no community involvement in the development of the overall vision and it is unclear whether stakeholders have been involved in the development of the vision for the site to create transparency in process. In addition, there are certainly new sites that have appeared in the publication draft that have not previously been consulted on in previous iterations of the plan i.e. Stratton Road site for 24 units (ref LP 1000). Community Infrastructure Levy (CIL) The CIL has been set ridiculously low to attract contractors; this in turn has reduced the possibilities of generating the necessary funding returning to the council for the development of the infrastructure. I don't see how that can be legal, to offer the land at a reduced levy so the developers can make even more money at the expense and economic effect to deliver the priorities of the infrastructure. Consistency with National Policy and Legislation The garden suburb strategy chosen by the council is not sustainable and is therefore contrary to NPPF - greenbelt policy. Additionally, the Council has not clearly set out the exceptional circumstances that warrant the release of Garden suburb area at individual sites such as Woodhouse LP1000). The site allocation is contrary to NPPF as the vision for the site would cause harm to the significance and setting of the buildings at Firth House Farm as heritage assets. Consistency with National Policy and Legislation The garden suburb strategy chosen by the council is not sustainable and is therefore contrary to NPPF - greenbelt policy. Additionally, the Council has not clearly set out the exceptional circumstances that warrant the release of Garden suburb area at individual sites such as Woodhouse Sustainability appraisal A sustainability appraisal has been undertaken but it does not adequately assess the sustainability of individual sites. There are discrepancies within this "" Woodhouse site scores poorly in terms of access. This questions the validity of the garden suburb policy which indicates that these are sustainable, when they are not. The proposed land use distribution is not sustainable. Specific assessment of the Woodhouse site -LP1451 suggests it is not a sustainable allocation, weakening the green belt and creating an urbanising effect. The Council admits in its own site assessment that the site does not score particularly well in accessibility terms but this seems to have been ignored on the basis this can be mitigated with on-site provision. Masterplan "" site LP1451 The indicative numbers do not corroborate with the supposed masterplan, in the Calderdale Planning officer assessment the information provided suggest that this site is only capable of providing 22 houses per hectare. This is in conflict with the masterplan which is working on 35 houses per hectare. It's evident that some land owners are hell bent on developing their land for housing and care little about the outcome of style, looks, impact on the community and interest of local residents. So it is alarming that the local planner's assessment, which is professionally linked to the local plan with their colleagues, accept a masterplan that conflicts by more than an additional third more housing

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

Sound Reason:

Soundness The plan is not 'sound' for the following reasons Green Belt Green belt is favoured by developers because it is cheaper to exploit than brownfield sites which have a much higher transaction costs. This should not be a factor, brownfield sites should be built on before green belt is ever considered, but Calderdale Council do not want to take advantage of the available brownfield sites in and around Halifax of which there are plenty but would rather shift the development out of Halifax to Brighouse green belt. The evidence provided to release green belt land at Woodhouse LP1451 for a garden suburb is not robust, credible or justified. There will be benefits in terms of affordable housing provision (this follows the standard policy expected within this locality and does not provide additional benefit) and contribution of

homes to meet the housing needs. Whilst open space will be provided within the site this is at the expense of the access to open countryside that is currently available and will be lost. These benefits do not exceed the harm to green belt, heritage and ecology of the site and negative impact on the surrounding existing community and infrastructure. The council identifies Woodhouse garden suburb LP1451 as most sensitive green belt in their evidence "" performing 4 of the 5 reasons for inclusion, this is in fact incorrect, the true figure being 3 out of 5 reasons. The green belt site survey form specifies categorically the site WOULD:- Potentially lead to ribbon development with a high potential for unrestricted sprawl. Lead to the coalescence of towns. Not safeguard the countryside from encroachment. Harm some of the heritage assets. Harm the wild life in the area It is clear this site is located within an area of green belt that performs the key strategic role of preventing the further merger of Kirklees with Calderdale. Green belt land to the south (within Kirklees boundary) was recently accepted for release for an urban extension by the Kirklees local plan inspector in July 2018 which already lessens the gap significantly and makes it even more important to retain and protect the role of the remaining green belt land in a meaningful manner. Building on this site LP1451 would further reduce the open gap between Kirklees and Calderdale contributing to the merger of the two settlements "" especially along the Huddersfield Road frontage, where the proposed M62 junction 24A is planned to go. This junction is currently identified as critical in both the Kirklees and Calderdale plan for the delivery of the raft of large housing sites within the area, although not in Highways England plans yet and no detail of design. This would result in continuous urban built form along this main road corridor. The remaining area proposed would only leave Bradley Wood in isolation, the majority of which is not open for general access as it is home to the West Yorkshire County Scout Camp and Activity Centre. In the spirit of the green belt this limited access would not represent 'accessible open countryside'. The proposal would undermine the purpose of including land in the green belt by:- Preventing meaningful access to the open countryside for those living in the surrounding urban area ---Removing opportunities for access to the open countryside for the urban population. Removing the opportunity for outdoor sport and outdoor recreation near urban areas. Removing an attractive landscape near to where people live, Removing land in agricultural and related uses.

Green belt not only prevents urban sprawl, it has an increasingly important role in storing carbon, preventing flooding and vital economic resources for food security and soil protection. Thus reducing the carbon footprint of the area. Also with the prospect of a challenging Brexit building on green belt/agricultural land that would be better used for grazing and growing crops should not be an option. Green belt should never be considered for building when there are many brownfield sites in Calderdale available. The garden suburb would encroach on the openness and permanence of the green belt removing land which would harm the landscape character of the area, which critically forms the setting of the ancient Bradley Wood and listed heritage assets at Firth House Farm (which lie within a central position within the proposed site). I object to this site LP1451 being developed due to its importance of being a green lung and replenishing much needed air supplies now and even more importantly the role it will play if the new motorway junction goes ahead. The NPPF clearly states that Local Plans should encourage solutions which support reductions in greenhouse gas emissions and reduce congestion. Nothing could be further from this in light of this plan for this area. Similarly, the updated NPPF clearly states in point 109 "" development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe "" and it's unmistakably clear it would be. It contravenes the above NPPF paragraphs "" Flooding The topography of the land lends itself to quite a steep slope, heading down to Brighouse's river Calder which is classed as flood zone 2, building on the land, tarmacking and concreting over the grass will lead to a significant amount of surface water which instead of being soaked up into the land would naturally travel downhill into potential new houses, increasing pressure on flood zone 2 and increasing the probability of cutting off the main train line and all the associated damage to track e.g. unable to take the weight of passing trains, one of which is the Grand Central to London. This would endanger significant economic transport links going against the fundamental aims to improve the local area. The NPPF states that local planning must

meet the challenge of climate change and flooding. There are no drainage reports for potential housing and it would be subject to a flooding risk assessment. In regard to climate change and wetter winters and summers this land must be kept as green belt to protect central Brighouse from further flooding issues and clearly the impact on various towns down the river and canal need to be taken into consideration, because once the water reaches the bottom of the hill more water will collect which will naturally keep travelling down any adjacent slope however slight. So I object to the land being developed due to the important role it plays in being part of the defence against flooding in the local area. Traffic, Road Infrastructure and Air Quality Brighouse is renowned for its high volume of traffic, so to even consider a garden suburb of 1250 houses on the green belt land of site LP1451 would suggest an additional 2,500+ vehicles in reality. It is calculated that most households on average undertake up to 6 vehicle trips a day going to and from work, school run, local deliveries, visiting the gym, shopping, hobbies, etc., which is potentially 15,000 extra journeys per day. Brighouse is regularly grid locked due to accidents/issues on the M62. Currently the road network is at capacity and the motorway junctions are regularly queuing. West Yorkshire Transport fund are considering another junction 24A at the northern part of Woodhouse Lane. There are no guaranteed or practical options to improve the area to cope with the potential increase of an additional 15,000 journeys a day. The mitigation summary that the M62 is a smart motorway does nothing to enhance movement of traffic in this area, all a smart motorway does is to put signs up to reduce the traffic speed assisted by cameras and does not diminish the fact that the M62 still suffers with over capacity every day of the week and the slightest incident has drivers heading for the local highway network which is already beyond capacity. Woodhouse Lane is a rat run for many vehicles trying to avoid the heavy main road traffic and all those cutting down to the Birds Royd Industrial Estate as well as parents from out of the area taking their children to school, with the majority of these vehicles disregarding the 20 mph speed limit. The fact that they and residents park on the road side makes the current situation almost impassable for local traffic and certainly when refuse vehicles, delivery lorries, local school buses and emergency vehicles pass by they regularly struggle and block the roads. It must be noted that the offset junction on Huddersfield Road (A641) with Toothill Bank/Woodhouse Lane is already an accident blackspot, in fact each road from Huddersfield Road towards the LP1451 site is not up to modern standards and fails miserably and are not suitable as a main approaches. The above junction is in danger from current and the potential increase of an extra 10,000 journeys a day and is in all probability going to affect the nitrogen dioxide levels in an area that is already an air quality management zone with dangerous level and would require serious solutions to reduce it. Calderdale is already one of 23 local authorities in England that have not met their air quality targets, , yet they are proposing to build 4,000 homes and an employment zone (warehousing) in an air quality management zone, so how do they propose to manage the increase in vehicle emissions that will result. Calderdale currently has seven air quality management areas (AQMA), all declared because the annual average concentration of Nitrogen Dioxide is too high or being exceeded. Trying to cross Huddersfield road with the dog at that junction (Huddersfield road/Woodhouse lane/Toothill Lane) at 08.30 am during school term time is already horrendous, you can stand for up to 10 minutes waiting to get across to the central reservation safely, whilst all the while breathing in traffic pollution that you can actually taste, you then have to get to the other side safely negotiating the traffic approaching at speeds in excess of the speed limit from the dual carriage way Site LP1618 which is over the road by the motorway would no doubt bring in significantly more vehicles with the emphasis being on HGV's possibly from countries with different pollution control limits on vehicles. This site alone could potentially generate another 2,500 journeys all adding to the air pollution in that area. The point is it is too much traffic for too small a highway network. So it would appear that Calderdale Council have not addressed the key government policies on reducing traffic and improving air quality. It is a well-known fact to those living in the area that the residential highways network is not suitable to accept either the level of development proposed or the associated construction traffic and recent heritage evidence prevents access from one route. There are no suitable approach roads from the A641 which is the only way this site can be accessed. Access from Birds Royd is limited by bridge restriction to 7.5Tonne. Woodhouse Lane, Rycroft Lane, Daisy Road and Armitage Avenue are all limited by on street parking, narrow sections of roads and blind bends.

Firth House Lane is unavailable due to its position in relation to grade II listed buildings. Heritage impact assessment restricts development from part of the site. There is to be no development around Firth House Farm and the access along Firth House lane is to be protected as well as other parts so this Prevents access through the length of the site. It is also extremely important for the emergency services such as Ambulances and Fire Appliances to have unrestricted access on the approach to the new development layout. The SE Strategic Vision highlights the strategic importance of the J24A scheme and proposes the main access into the Woodhouse site from the A641 will not be implemented until there is greater certainty about the future of M62 J24A. What contributes even further to this development not being sound and/or unworkable is this junction scheme is currently not even identified in the Highways England plan. Kirklees' evidence specifically indicates that the J24A provides key transport mitigation to assist delivery of their sites around Bradley/Fixby area and adjoining authority. Therefore since access cannot be satisfactorily provided or planned, the inspector is urged to consider whether development of the Woodhouse garden suburb is premature for this review pending confirmation of the design and impact of the M62 24A strategic highway junction improvement scheme. Air Quality; National Planning Policy National planning policy regulations for promoting a healthy environment Promoting healthy and safe communities To enable and support healthy lifestyles especially where this would address identified local health and well-being needs, for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling. Anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate. Community Infrastructure Levy (CIL) The council have decided to adopt an approach of using differential rates. How and why did the council decide to set these differential rates? Did they undertake a fine-grained sampling to help to estimate the Boundaries for their differential rates? If this is the case could they demonstrate how they arrived at £40 per square meter in Thornhill and Woodhouse? Having regard for the following points, are the policies and proposals for Woodhouse Garden Suburb soundly based? Traffic and Transport, other infrastructure and services air quality, fresh and waste water flooding, landscape and nature conservation, a realistic delivery during the plan period. My information is that since 2001 overall receipts from section 106 agreements brought in £6,700,073 for the council but a huge £24,469,500 could be brought in from CIL, levied on residential and retailing developments. The latter figure is only illustrative and will be less than this as a result of exemptions and distribution of developments, but they do indicate a bigger benefit. The settings of Heritage Assets Heritage England note that the group of listed buildings at Firth House lie within an open rural landscape, likely to have remained relatively unchanged, and therefore greatly contributing to their historic setting and enhancing the buildings' significance. A Heritage Impact Assessment has now been carried out following these comments (April 2018) although this is not reflected in the submitted vision and it is clear that there will be major harm to the settings of three listed buildings and other heritage assets without significant changes to the vision including restrictions/reductions on the proposed development. There are significant areas where no development should take place at all and areas where development should be restricted. Notably the trees, hedgerow and stone walls along Firth House Lane should be retained and enhanced. The council has NOT reflected this in the developable area at Appendix 1 site allocations (developable area). As a single track this means it does not provide a suitable access into the site in its current form as proposed in the vision. Even if it did, it is constrained by development at the entrance onto Woodhouse Lane. This restriction critically means the main arterial route proposed through the length of the site to serve development would not be acceptable either as it would have to puncture the lane resulting in significant harm to this heritage asset. Therefore the site allocation is contrary to NPPF as the vision for the site would cause harm to the significance and setting of the buildings at Firth House Farm as heritage assets and it can be concluded that the masterplan vision for the site is NOT deliverable or sound. Additionally, the masterplan strategic vision also fails to provide further technical information needed to determine the impact on the scale and form of development, the developable area or how it meets 'garden city' principles :- Motorway noise "" what is the impact/buffers need to be defined? Land contamination? Non mains drainage? Impact on Brighouse AQMA and the impact on air quality and

designation as an AQMA at Toothill which is currently being monitored for traffic pollution. Ecological survey and impact on the wildlife corridor and ancient woodland Requirements for health service provision and early years provision As such there is no clear framework to justify the development as proposed

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

Duty to Co-operate Reason:

DUTY TO CO-OPERATE The council have tried to show they have met the 'duty to co-operate'. However, it is evident that green belt is a key strategic constraint on delivering housing needs across West Yorkshire if the existence of brownfield sites to be ignored and specifically in Kirklees and Calderdale. However, there appears to have been no in-depth analysis of the issues facing local planning authorities in this respect. There is reference that this will potentially start in the next plan making period. In the meantime, each local authority has focused inwardly and turned to green belt release to achieve their own individual housing numbers. This has resulted in a number of large 'bolt on estates' to settlements in Brighouse and Kirklees which will create significant areas of overdevelopment and overload existing infrastructure rather than sustainable development. Whilst it is accepted that individual authorities are at different timescales in their delivery plans, the 'duty to co-operate' should have looked at this as an alternative strategy to plan development in a more sustainable way. A larger than locally led approach could provide a more sustainable option with a properly planned new garden village with sufficient room for expansion and the ability to achieve a self-contained and sustainable community in the right location. Clearly these are hard decisions to make and would have implications on green belt. This has not been assessed to support the housing market. Instead we are left with a strategy that will overload the current infrastructure and in the case of Woodhouse' a proposal that will not in any way make a 'positive impact' for the community or location.

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX463**

Site ref (if applicable): **LP1451**

Person ID: **11348**

Name: **Mrs Mavis Walker**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Inadequate public involvement on strategy within Brighouse for:- *The scale of development planned -31% increase. Not proportionate to the scale of development planned for the town. * The strategy has changed throughout the plan without adequate community involvement. Woodhouse garden suburb was not originally included providing no opportunity for early consultation in the process to enable input on such a significant proposal. *There has been no community involvement in the development of the overall vision and it is unclear whether stakeholders have been involved in the development of the vision for the site to create transparency in process. *In addition, there are certainly new sites that have appeared in the publication draft that have not previously been consulted on in previous iterations of the plan i.e. Stratton Road site for 24 units (ref LP1000). Consistency with National Policy and Legislation The garden suburb strategy chosen by the council is not sustainable and is therefore contrary to NPPF - greenbelt policy.

Additionally, the Council has not clearly set out the exceptional circumstances that warrant the release of Garden suburb area at individual sites such as Woodhouse Sustainability appraisal A sustainability appraisal has been undertaken but it does not adequately assess the sustainability of individual sites. There are discrepancies within this "“ Woodhouse site scores poorly in terms of access. This questions the validity of the garden suburb policy which indicates that these are sustainable, when they are not. The proposed land use distribution is not sustainable. Specific assessment of the Woodhouse site - LP1451 suggests it is not a sustainable allocation, weakening the green belt and creating an urbanising effect. The Council admits in its own site assessment that the site does not score particularly well in accessibility terms but this seems to have been ignored on the basis this can be mitigated with on-site provision .

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

Sound Reason:

The plan is "unsound" for the following reasons

Flooding The topography of the land lends itself to quite a steep slope, heading down to Brighouse's river Calder which is classed as flood zone 2, building on the land, tarmacking and concreting over green belt will lead to a significant amount of surface water which would naturally travel downhill into potential new houses, increasing pressure on flood zone 2 and increase the probability of cutting off the main train line and all the associated damage to track e.g. unable to take the weight of passing trains, one of which is the Grand Central to London. This would endanger significant economic transport links going against the fundamental aims to improve the local area. The NPPF states that local planning must meet the challenge of climate change and flooding. There are no drainage reports for potential housing and it would be subject to a flooding risk assessment. In regards to climate change and wetter winters and summers this land must be kept as green belt to protect of central Brighouse from further flooding issues and clearly the impact on various towns down the river and canal need to be taken into consideration. So I object to the land being developed due to the important role it plays in being part of the defence against flooding in the local area.

Traffic, Road Infrastructure and Air Quality Brighouse is renowned for its high volume of traffic, so to even consider a garden suburb of 1250 houses on the green belt land of site LP1451 would suggest an additional 2,500+ vehicles in reality. It is calculated that most households on average undertake up to 6 vehicle trips a day going to and from work, school run, local deliveries, visiting the gym, shopping, hobbies, etc., which is potentially 15,000 extra journeys per day. Brighouse is regularly grid locked due to accidents/issues on the M62. Currently the road network is at capacity and the motorway junctions are regularly queuing. West Yorkshire Transport fund shelved the idea of introducing another junction (24A) at the northern part of Woodhouse Lane. There are no guaranteed or practical options to improve the area to cope with the increase of an additional 15,000 journeys a day. The mitigation summary that the M62 is a smart motorway does nothing to enhance movement of traffic, all a smart motorway does is to put signs up to reduce the traffic speed and does not diminish the fact that the M62 still suffers with over capacity every day of the week and the slightest incident has drivers heading for the local highway network which is already beyond capacity. Woodhouse Lane is a rat run for many vehicles trying to avoid the queuing traffic on Huddersfield Road into Brighouse, there is also those cutting down to the Birds Royd Industrial Estate as well as parents from out of the area taking their children to school, with the majority of these vehicles disregarding the 20 mph speed limit. The fact that parents on the school run and residents park on the road side makes the current situation almost impassable for local traffic and certainly when refuse vehicles, delivery lorries, local buses, school buses and emergency vehicles pass by they regularly struggle and block the roads. It must be noted that the offset junction on Huddersfield Road (A641) with Toothill Bank/Woodhouse Lane is already an accident blackspot, in fact each road from Huddersfield Road towards the LP1451 site is not up to modern standards and fails miserably and are not suitable as a main approaches. The above junction will increase the danger level from current traffic, and an extra 10,000 journeys a day will increase the nitrogen dioxide levels in an area that is already failing air quality management, this will require serious solutions to reduce it. Calderdale is already one of 23 local authorities in England that have not met their air quality targets, yet

they are proposing to build 4,000 homes and an employment zone (warehousing) in an air quality management zone, so how do they propose to manage the increase in vehicle emissions that will result. Calderdale currently has seven air quality management areas (AQMA), all declared because the annual average concentration of Nitrogen Dioxide is being exceeded. Trying to cross Huddersfield road with the dog at that junction (Huddersfield road/Woodhouse lane/Toothill Lane) at 08.30 am during school term time is already horrendous, you can stand for up to 10 minutes waiting to get across to the central reservation safely, whilst all the while breathing in traffic pollution that you can actually taste, you then have to get to the other side safely negotiating the traffic approaching at speeds in excess of the speed limit from the dual carriage way. Site LP1618 which is over the road by the motorway would no doubt bring in significantly more vehicles with the emphasis being on HGV's possibly from countries with different pollution control limits on vehicles. This site alone could potentially generate another 2,500 journeys all adding to the air pollution in that area. The point is it is too much traffic for too small a highway network. So it would appear that Calderdale Council have not addressed the key government policies on reducing traffic and improving air quality. It is a well known fact to those living in the area that the residential highways network is not suitable to accept either the level of development proposed or the associated construction traffic. There are no suitable approach roads from the A641 which is the only way this site can be accessed. Access from Birds Royd is limited by bridge restriction of 7.5Tonne. Woodhouse Lane, Rycroft Lane, Daisy Road and Armitage Avenue are all limited by on street parking, narrow sections of roads and blind bends. Firth House Lane is unavailable due to its position in relation to grade II listed buildings. Heritage impact assessment restricts development from part of the site. There is to be no development around Firth House Farm and the access along Firth House lane is to be protected as well as other parts, so this prevents access through the length of the site . It is also important for the emergency services i.e. Ambulance and Fire Appliances to have unrestricted access on the approach to the new development layout. The SE Strategic Vision highlights the strategic importance of the J24A scheme and proposes the main access into the Woodhouse site from the A641 will not be implemented. Until there is greater certainty about the future of M62 J24A, this development is not workable. This junction scheme is currently not even identified in the Highways England plan. Kirklees evidence specifically indicates that the J24A provides key transport mitigation to assist delivery of their sites around Bradley/Fixby area and adjoining authority. Therefore since access cannot be satisfactorily provided or planned, the inspector is urged to consider whether development of the Woodhouse garden suburb is fit for purpose for this review pending confirmation of the design and impact of the M62 24A strategic highway junction improvement scheme. Calderdale Council have decided to adopt an approach of using different Community Infrastructure Levy (CIL) rates, whereas the levy in Hebden Bridge is £85 per square metre and the proposed Woodhouse Garden Suburb at £40 per square metre. Why did the Council decide to set these differential rates? Having particular regard to the following, are the policies and proposals for LP1451 soundly based? Traffic and transport; infrastructure and services; air quality; fresh and waste water and flooding; land and natural conservation; realistic delivery within the plan period. It would appear that the council are trying to make LP1451 more attractive to developers at the expense of roads, flooding, schools and other facilities, as this levy is the financial support for the funding of the infrastructure. Air Quality; National Planning Policy National planning policy (the following are some of the regulations for promoting a healthy environment) Promoting healthy and safe communities To enable and support healthy lifestyles especially where this would address identified local health and wellbeing needs, for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling. Green Belt Green belt is favoured by developers because it is cheaper to exploit than brownfield sites which have a much higher transaction costs. This should not be a factor, brownfield sites should be built on before green belt is ever considered, but Calderdale Council do not want to take advantage of the available brownfield sites in and around Halifax of which there are plenty but would rather shift the development out of Halifax to Brighouse green belt. The evidence provided to release green belt land at Woodhouse LP1451 for a garden suburb is not robust, credible or justified. The benefits of green belt (fresh air, health and wellbeing) far outweigh the

benefits of a housing development (congestion, longer commutes and dangerous levels of air pollution which causes respiratory illnesses). Whilst open space will be provided within the garden suburb this is at the expense of access to open countryside that is currently available and will be lost. Building on green belt impacts negatively on the environment, it is detrimental to wild life, heritage, ecology and the surrounding existing community and infrastructure. The council identifies Woodhouse garden suburb LP1451 as most sensitive green belt in their evidence "" performing 4 of the 5 reasons for inclusion, this is in fact incorrect, the true figure being 3 out of 5 reasons. The green belt site survey form specifies categorically the site WOULD:- Potentially lead to ribbon development with a high potential for unrestricted sprawl. Lead to the coalescence of towns. Not safeguard the countryside from encroachment. Harm some of the heritage assets. Detrimental to the wildlife corridor.

It is clear this site is located within an area of green belt that performs the key strategic role of preventing the further merger of Kirklees with Calderdale. Green belt land to the south (within Kirklees boundary) was recently accepted for release for an urban extension by the Kirklees local plan inspector in July 2018 which already lessens the gap significantly and makes it even more important to retain and protect the role of the remaining green belt land in a meaningful manner. Building on this site LP1451 would further reduce the open gap between Kirklees and Calderdale contributing to the merger of the two settlements "" especially along the Huddersfield Road frontage, where the proposed M62 junction J24A is planned to go. This junction is currently identified as critical in both the Kirklees and Calderdale plan for the delivery of the raft of large housing sites within the area, although not in Highways England plans yet and no detail of design. This would result in continuous urban built form along this main road corridor. The remaining area proposed would only leave Bradley Wood in isolation, the majority of which is not open for general access as it is home to the West Yorkshire County Scout Camp and Activity Centre. In the spirit of the green belt this limited access would not represent ""accessible open countryside". The proposal would undermine the purpose of including land in the green belt by:- Preventing meaningful access to the open countryside for those living in the surrounding urban area.

Removing opportunities for access to the open countryside for the urban population. Removing the opportunity for outdoor sport and outdoor recreation near urban areas. Removing an attractive landscape near to where people live, Removing land in agricultural and related uses.

Green belt not only prevents urban sprawl, it has an increasingly important role in storing carbon, preventing flooding and vital economic resources for food security and soil protection. Thus reducing the carbon footprint of the area. Also with the prospect of a challenging Brexit building on green belt/agricultural land that would be better used for grazing and growing crops should not be an option. If all the green belt in this area is developed into garden suburbs where are families and dog walkers going to walk when all the open countryside is built on. This area does not lend itself to affordable housing. Affordable housing should be within easy walking distance to a train station, bus station, doctors, dentists, schools, shops, amenities and entertainment. The garden suburb would encroach on the openness and permanence of the green belt removing land which would harm the landscape character of the area, which critically forms the setting of the ancient Bradley Wood and listed heritage assets at Firth House Farm (which lie within a central position within the proposed site). The settings of Heritage Assets Heritage England note that the group of listed buildings at Firth House lie within an open rural landscape, likely to have remained relatively unchanged, and therefore greatly contributing to their historic setting and enhancing the buildings' significance. A Heritage Impact Assessment has now been carried out following these comments (April 2018) although this is not reflected in the submitted vision and it is clear that there will be major harm to the settings of three listed buildings and other heritage assets without significant changes to the vision including restrictions/reductions on the proposed development. There are significant areas where no development should take place at all and areas where development should be restricted. Notably the trees, hedgerow and stone walls along Firth House Lane should be retained and enhanced. The council has NOT reflected this in the developable area at Appendix 1 site allocations (developable area). As a single track this means it does not provide a suitable access into the site in its current form as proposed in the vision. Even if it did, it is constrained by development at the entrance onto Woodhouse Lane. This restriction critically means the main arterial route proposed through

the length of the site to serve development would not be acceptable either as it would have to puncture the lane resulting in significant harm to this heritage asset. Therefore the site allocation is contrary to NPPF as the vision for the site would cause harm to the significance and setting of the buildings at Firth House Farm as heritage assets and it can be concluded that the masterplan vision for the site is NOT deliverable or sound. Additionally, the masterplan strategic vision also fails to provide further technical information needed to determine the impact on the scale and form of development, the developable area or how it meets "garden city' principles :- Motorway noise " what is the impact/buffers need to be defined? Land contamination? Non mains drainage? Impact on Brighouse AQMA and the impact on air quality and designation as an AQMA at Toothill which is currently being monitored for traffic pollution. Ecological survey and impact on the wildlife corridor and ancient woodland Requirements for health service provision and early years provision As such there is no clear framework to justify the development as proposed.

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

Duty to Co-operate Reason:

The council have failed to show they have met the 'duty to co-operate'. However, it is evident that green belt is a key strategic constraint on delivering housing needs across West Yorkshire and specifically in Kirklees and Calderdale. However, there appears to have been no in-depth analysis of the issues facing local planning authorities in this respect. There is reference that this will potentially start in the next plan making period. In the meantime, each local authority has focused inwardly and turned to green belt release to achieve their own individual housing numbers. This has resulted in a number of large 'bolt on estates' to settlements in Brighouse and Kirklees which will create significant areas of overdevelopment and overload existing infrastructure rather than sustainable development. The lack of co-operation between the councils will eventually reduce any buffer zone and will result in urban sprawl Whilst it is accepted that individual authorities are at different timescales in their delivery plans, the 'duty to co-operate' should have looked at this as an alternative strategy to plan development in a more sustainable way. A larger than locally led approach could provide a more sustainable option with a properly planned new garden village with sufficient room for expansion and the ability to achieve a self-contained and sustainable community in the right location. Clearly these are hard decisions to make and would have implications on green belt. This has not been assessed to support the housing market. Instead we are left with a strategy that will overload the current infrastructure and in the case of Woodhouse' a proposal that will not in any way make a 'positive impact' for the community or location.

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX497**

Site ref (if applicable): **LP1451**

Person ID: **1121091**

Name: **Mrs Rachel Downey**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

As a household with a young family with children under the age of 10 who have lived in the area for the past five years one of the main attractions of the area when we moved here was the open space behind

Woodhouse lane. I have objected many times in the past regarding the local plan commenting on areas such as loss of green belt areas, lack of infrastructure etc. The fact that comments are now expected to be about Regulation 19 makes it significantly more difficult for myself to comment confidently, I have therefore come together with the Woodhouse local community sharing best practise and sourcing knowledge from others who are more au-fait with the consultation process, nevertheless I still feel my previous comments are wholly relevant (the fact I have not received a response to my comments within Regulation 18 suggests the council is not being procedurally correct and has therefore shown a failure to consult with the local community). I therefore object to the local plan for each of the following reasons from a legal standpoint :Inadequate public involvement given the scale of development proposed for Brighouse (increasing its size by 31%) the scale of involvement would not seem proportionate to the scale of development planned for the town. Furthermore, the strategy has changed throughout the plan without adequate community involvement. Woodhouse garden suburb was not originally included providing no opportunity for early consultation in the process to enable input on such a significant proposal. There has been no community involvement in the development of the overall vision and it is unclear whether stakeholders have been involved in the development of the vision for the site to create transparency in process. In addition, there are certainly new sites that have appeared in the publication draft that have not previously been consulted on in previous iterations of the plan ie Stratton Road site for 24 units (ref LP1000). Consistency with National Policy and Legislation the garden suburb strategy chosen by the council is not sustainable and is therefore contrary to NPPF - greenbelt policy. Additionally, the Council has not clearly set out the exceptional circumstances that warrant the release of Garden suburb area at individual sites such as Woodhouse Sustainability appraisal, the Woodhouse site scores poorly in terms of access.

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

Sound Reason:

The plan is 'Unsound' for the following reasons:-i) Unsustainable Growth Strategy- The need to provide new homes to meet identified need is not disputed although without detailed expertise in this field it is difficult to know whether the Strategic Housing Needs Assessment is sound. Housing needs to be provided in the right location and of the right type to meet identified need which I assume the Inspector will check. Can the Council provide evidence that there is a significant, disproportionate need for new homes in Brighouse? Housing completions within Calderdale have remained very low over the last few years when compared to the other Leeds City Region authorities. The housing delivery strategy taken relies on a dramatic increase in land supply as the principal mechanism to deliver growth in housing completions. Given current delivery this would not appear to be realistic as it relies on the expectation that a sudden influx of additional, greenfield sites into the land supply will result in rapid acceleration in housebuilding to reverse long-term trends. The Council should evidence clearly how this is realistic. There is insufficient evidence/justification that the strategy to focus significant housing and employment growth in the south east would be a sustainable pattern of development. Regionally, the Leeds City Region Strategic Economic Plan does not even identify Brighouse as a housing growth area but rather focuses growth on Halifax for Calderdale" so why has this been chosen for the bulk of housing growth? The strategy for delivery will result in the over development of Brighouse. The town will take a third of all new development, increasing its size by almost 32% stretching already creaking infrastructure - which is unsustainable. The timely delivery of necessary infrastructure is an important matter for any local plan. In this case, with the substantial growth around Brighouse, it is an exceptionally critical issue. Significant concern is raised about the ability for necessary infrastructure to be in place at the point needed and whether it will be sufficient and not worsen the current issues that exist. Brighouse already suffers from high gross commuting levels, 70% of people work outside the town travelling to Halifax and the surrounding authorities. The car is the dominant mode for all movements in the town as the public transport links- particularly the train system is so poor and unreliable. The plan provides insufficient information about the infrastructure required to

support the significant growth that will come from such a vast house building program. The M62 24a junction (which has been identified as essential to meet the growth needs not only of Brighouse but also the recently approved Kirklees'sites at Bradley/Fixby) is not currently in Highway England plans. The council should provide evidence to demonstrate/ confirm with some certainty that highways infrastructure will come forward to demonstrate adequately that development growth is sustainable (ie can the modal shift from cars to other modes be substantiated and can be delivered in the proposed timeframe in these locations . Justification for removal of the Brighouse Garden Suburbs from highly sensitive green belt is made on the basis they provide sustainable locations for development. Although significantly the Woodhouse site (LP1451) was originally discounted on the grounds of green belt /sustainability early in the process. If the Calderdale Plan is to meet both its employment aspirations and its aims to reduce transport-related carbon emissions, then there must be convincing evidence that the housebuilding strategy WILL significantly reduce in-commuting, and not increase out-commuting which appears to be the case. Policy SD2 sets out good development tests to support Calderdale's greenhouse gas reduction targets. However this is at odds with the significant proportion of growth that would be focused on 'Garden Suburbs' that depend on 'enhanced infrastructure provision' and are accompanied by a forecast 'increase in car growth'. Urban extensions and new settlements can only be considered sustainable if they have exceptional levels of public transport accessibility "" in which case they would also be expected to deliver high residential densities and a mix of uses. The evidence does not suggest this is the case and the Garden Suburb proposals appear recklessly unsustainable. There is no evidence to confirm the garden suburbs will be self contained, sustainable communities in accordance with the government's expectations for garden communities. The Woodhouse LP1451 site vision provides nothing more than a primary school to cater for the new housing development. No plans for GP surgeries, dentists etc- the existing ones in the Brighouse area are already oversubscribed. The site will be no more than a large commuter settlement which has been allocated on the basis of its location close to a main transport route and which will add to the already overburdened infrastructure and capacity of Brighouse. The plan justifies the allocation of sites in more strongly-performing Green Belt parcels, such as at Woodhouse, without a site-by-site analysis so it is not apparent what the scale of this impact is on the purposes of the Green Belt. Any justification of exceptional circumstances for taking land out of the Green belt must show, on the one hand, that doing so will realistically and sustainably deliver the intended scale of development; and on the other hand, that the degree of impact on the purposes of the Green Belt will not be unacceptable. This has not been properly evidenced within the strategy. The council need to demonstrate this.

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

Duty to Co-operate Reason:

I believe it is reported and evident that green belt is a key strategic constraint on delivering housing needs across West Yorkshire and specifically in Kirklees and Calderdale. However, there appears to have been no in-depth analysis of the issues facing local planning authorities in this respect. Each local authority has focused inwardly and turned to green belt release to achieve their own individual housing numbers. This has resulted in a number of large 'bolt on estates' to settlements in Brighouse and Kirklees which will create significant areas of overdevelopment and overload existing infrastructure rather than sustainable development. Whilst it is accepted that individual authorities are at different timescales in their delivery plans, the 'duty to co-operate' should have looked at this as an alternative strategy to plan development in a more sustainable way. A larger than locally led approach could provide a more sustainable option with properly planned new garden village with sufficient room for expansion and the ability to achieve a self contained and sustainable community in the right location. Clearly these are hard decisions to make and would have implications on green belt. This has not been assessed to support the housing market. Instead we are left with a strategy that will overload the current infrastructure and in the case of Woodhouse' a proposal that will not in anyway make a 'positive impact' for the community or location.

Suggested Modifications:

I believe that brown belt land should be used before Green belt is considered.

Additional Evidence Link:

Comment ID **APX510**

Site ref (if applicable): **LP1451**

Person ID: **1128619**

Name: **Dr Stephen Featherstone**

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 express my grave concern about the developments proposed. Has Calderdale council assessed if there is capacity in our general practice services to accept new registrations associated with these developments? I do not think there will be enough gp's/nurses /district nurses in the local area to accommodate such a development .

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 **APX515**

Site ref (if applicable): **LP1451**

Person ID: **955301**

Name: **Barbara Ryan**

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 **APX518**

Site ref (if applicable): **LP1451**

Person ID: **1125048**

Name: **Mr Geoffrey English**

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?: **No**

Sound Reason:

The site is a high scoring green belt site and wildlife corridor. It is essential to give a boundary to Rastrick as Kirklees are looking to build on the their side of the boundary, thus causing the two areas to merge. The plan seems to rely heavily on a new motorway junction 24A which is uncertain. The current roads are not suitable for a large new housing development. Any surveys done by the Council seem to be years out of date. The site is a high scoring green belt site and wildlife corridor. It is essential to give a boundary to Rastrick as Kirklees are looking to build on the their side of the boundary, thus causing the two areas to merge. The plan seems to rely heavily on a new motorway junction 24A which is uncertain. The current roads are not suitable for a large new housing development. Any surveys done by the Council seem to be years out of date.

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 **APX526**

Site ref (if applicable): **LP1451**

Person ID: **1117974**

Name: **Mr Guy Utley**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I'm shocked at that the lack of involvement that the council has allowed the residents of Brighouse to have on this topic. I've had no communication or option to feedback on this other than online here. It sounds like the decision is already made and these houses will be built regardless of our concerns. Why is

Brighouse having so much of the allocated house... is it be the Calderdale council don't really give two monkey's about Brighouse? it feel like they are too concern with making the Piece Hall work for Halifax.

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

Sound Reason:

My biggest concern is the roads. It takes me 20mins to travel from my place of work in Leeds city centre to the Brighouse junction but it can take another 20mins sometimes longer to get through 1 mile of Brighouse's town centre roads. Without the proper road upgrades, Brighouse will be an absolute mess. Not only will this add extra time to people everyday commute but it will also damage local business as people will not want to travel to an over congested town centre. We live of Huddersfield road and have a six year old that regularly plays in the Garden. the amount of traffic on Huddersfield road (A641) is already a concern in terms of pollution and the noise is just horrendous. Surely the noise pollution alone is above the safe standard. I understand we need more house but the level of house Brighouse is being allocated vs the rest of Calderdale will damage Brighouse beyond recognition. What a shame.

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 **APX559**

Site ref (if applicable): **LP1451**

Person ID: **1046644**

Name: **Mr Alistair Sutcliffe**

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?: **No**

Sound Reason:

As someone who lived on Woodhouse Lane for approx 25years and now living on Long Fallas Crescent, I'm more than aware of how busy this area is. Woodhouse Lane has always been treated as a rat run and this has only grown worse over the years as more businesses have opened on Birds Royd. Despite the 20mph signs, most people show a blatant disregard for this and regularly come down twice as fast. What with the cars parked on the road side it's a miracle there hasn't been a fatal accident. On top of this, all the cars that try and take a short cut down here to avoid the queuing traffic into Brighouse town centre which can queue all the way back upto Armitage Avenue and beyond. And this is before we include the traffic that use Brighouse as a short cut when there has been one of the many accidents on the m62. So the mind boggles at the prospect of so many houses being built in this area, with all the extra traffic this would incur. Where is all this extra traffic expected to go? There is currently already a shortage of schools, dentists and doctors around here too. It seems obvious that the councillors who are interested in forcing this through live nowhere near this area and have no idea what the impact would be on current council tax payers. As a

resident who will be majorly impacted by these proposals I have only found out about them through flyers posted by other residents. The council haven't made anyone aware and the website to register my comments seems to be so difficult I can imagine many people giving up. Maybe the council are hoping that happens. Brighouse and the surrounding areas just cannot cope with the current influx of traffic as it is and a rethink is needed over these proposals. I fear though that they have already been approved regardless of what the current residents think.

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 **APX585**

Site ref (if applicable): **LP1451**

Person ID: **1182803**

Name: **Miss Sally Turgoose**

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?: **No**

Sound Reason:

I have only recently moved into Woodhouse Lane but have lived nearby for 10 years and my daughter goes to Woodhouse School. The first big problem is the infrastructure around the area as Brighouse is a total traffic bottleneck. Almost every day there are queues to get down Huddersfield Road into Brighouse, the slightest problem on the motorway creates a complete jam around the area and people use Woodhouse Lane as a 'rat run' to avoid the queue (very rarely keeping to the 20 mph speed limit). The prospect of over 1200 extra homes in that area would create an even worst impact leading to increased traffic, increased queues and increased pollution. The site is next to Bradley Wood one of the few green areas that will be left in the area if Kirklees and Calderdale Councils build on all the planned sites that they are considering - I do not see the need to build on a green site when there are so many brown field sites available and that should be used first. Woodhouse School is full to capacity so there would need to be an additional school, as well as considering the availability of doctors or dentists. In my opinion the proposal is unacceptable and unworkable.

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

Duty to Co-operate Reason:

Suggested Modifications:

Building should not take place at the proposed site - brown field sites should be used at a different location in Calderdale rather than Brighouse.

Additional Evidence Link:

Comment ID **APX614**

Site ref (if applicable): **LP1451**

Person ID: **1123218**

Name: **Mrs Lindsey Walton**

Organisation:

Agent ID:

Name:

Organisation:

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 is near to ancient woodland - Bradley Wood and Scout camp - the area will be destroyed by nearby housing. The proposed building of housing in Rastrick and Brighouse is disproportionate - it is three times the size of development in Halifax although we are only 15% of the borough. Development in brown land areas has been rejected as well as development in areas that would benefit from the economic growth. The decision to build in Rastrick is political, not sound. The labour councillors of Halifax have voted against development in their constituencies and for development in conservative areas. The area of land is close to M62 motorway. It was protected green belt providing a buffer against air pollution. Brighouse is listed as an area of Calderdale that exceeds the average concentration of nitrogen oxide which has recently been scientifically proven to reach the placenta of unborn babies. Calderdale has a priority to 'strengthen visible commitment to air quality improvements'. It can't do this by building houses next to motorways and removing trees, grasslands and hedges. Calderdale has no plans to improve infrastructure. They have committed to building a primary school on the site, but the development of 1257 house needs new roads, a new junction from the M62, new roundabouts and extra doctors' surgeries. The current access points are small country lanes with housing on either side. The M62 already creates huge congestion through Brighouse with Huddersfield Road gridlocked most days. The junction of Toothill Bank is extremely dangerous with regular car collisions. The council is proposing a £40 levy on each house built in Brighouse whereas it is £85 infrastructure levy per house in Hebden Bridge. How can this discrepancy be accounted for? Are the councillors corrupt and lining their own pockets? The council have no funds for infrastructure and will rob us of potential funds to get a good deal for themselves. The fields and woodland are home to a wide diversity of plants, trees and wildlife including deer and bats. Their habitat should not be destroyed. The area will have an increased risk of flooding especially when water runs into the basin towards the river and canal. ROKT, Millers and Welholme areas were severely flooded two years ago.

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

Duty to Co-operate Reason:

There is no evidence or documentation to show that Calderdale has co-operated or consulted with councillors in Kirklees or Bradford. Both councils are proposing their own developments at Bradley Bar and Wyke areas which will multiply the major issues of lack of infrastructure and the impact of housing developments and congestion from the M62. All local concerns that were expressed via email or this site from the last round of consultations have not been addressed. All those concerns were deleted and not responded to. My concerns about the lack of infrastructure have not been addressed but simply ignored. The council has a duty to explain how our real fears will be overcome but they have not.

Suggested Modifications:

Other brown land sites in Calderdale should be identified for housing development including empty mills and warehouse.

Additional Evidence Link:

Comment ID **APX652**

Site ref (if applicable): **LP1451**

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:

There is a group of Grade II Listed Buildings at Firth House in the centre of this proposed Urban Extension. The Heritage Impact Assessment considered that since the assets lie at the centre of the proposed site which includes all the fields surrounding the listed building, development on the fields to the north, west and south will substantially affect the setting of the listed buildings and important views across the open countryside. Fields to the east are less significant due to the sloping topography and modern buildings immediately adjacent to the rear of the listed buildings. 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 LP1451 amend the penultimate Site Specific Consideration to read:- "Implementation of the mitigation measures set out in the Heritage Impact Assessment"²

Additional Evidence Link:

Comment ID **APX655**

Site ref (if applicable): **LP1451**

Person ID: **1115925**

Name: **Mr Ramsey Baker**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Inadequate public involvement Public involvement has not been sufficient, given the sheer scale of the proposed local development. Residents have not received a mail shot from the Authority explaining the plan or how to make comments. Woodhouse 'garden suburb' has not been sufficiently defined so that it has been simply impossible for residents to make an informed opinion on the proposals. Additional sites have appeared in the draft (ref LP1000) that have not previously been consulted on.

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

Sound Reason:

Any justification of exceptional circumstances for taking land out of the Green belt must show, on the one hand, that doing so will realistically and sustainably deliver the intended scale of development; and on the other hand, that the degree of impact on the purposes of the Green Belt will not be unacceptable. This has not been properly evidenced within the strategy. The council need to demonstrate this. Since access cannot be satisfactorily provided or planned, the inspector is urged to consider whether development of the Woodhouse garden suburb is premature for this plan review pending confirmation of the design and impact of the M62 24a strategic highway junction improvement scheme. The proposed land use distribution is not sustainable. Specific assessment of the Woodhouse site -LP1451 suggests it is not a sustainable allocation, weakening the green belt and creating an urbanising effect. The council need to clearly set out why this location and what local level exceptional circumstances exist to justify how the benefits exceed the harm to green belt: The Council identifies Woodhouse garden suburb "" LP1451 as most sensitive green belt in their evidence "" performing 4 of the 5 reasons for inclusion. The green belt site survey form specifies categorically the site WOULD potentially lead to ribbon development with a high potential for unrestricted sprawl lead to the coalescence of towns. not safeguard the countryside from encroachment harm some heritage assets Woodhouse Site LP1451 should be removed as a garden suburb housing site and retained as green belt. The designation is premature pending details of the strategic M62 24a junction proposal. It is contrary to NPPF in that it would not represent sustainable development and exceptional circumstances to remove the site from green belt have not been demonstrated or justified. The proposed vision is not deliverable "" access is not suitable, development as envisaged would impact on heritage and ecology assets and have a detrimental impact on the surrounding residential area.

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

Duty to Co-operate Reason:

There appears to have been no in-depth analysis of the issues facing local planning authorities. A larger than locally led approach could provide a more sustainable option with a properly planned new garden village with sufficient room for expansion and the ability to achieve a self contained and sustainable community in the right location Consequently, we are left with a strategy that will overload the current infrastructure and in the case of Woodhouse' a proposal that will not in anyway make a 'positive impact' for the community or location.

Suggested Modifications:

The policy be amended to include 'garden city' principles for garden suburb proposals to ensure the

schemes integrate exemplar levels of design and sustainability and early community involvement including the preparation of an engagement strategy. Master Planning of Housing Sites Master planning is required for all strategic housing sites with a capacity for 500 or more dwellings. In relation to allocated housing sites below this threshold, the Council will expect the Design and Access Statement to include evidence that the criteria set out under the bullet points in this policy have been taken into account in preparing the application. The production of a master plans for strategic housing sites should involve the all relevant stakeholders, including the Council, infrastructure providers, landowners, developers, the local community, service providers and other interested parties early in the process and ideally at vision forming stage. A clear engagement plan should be prepared at the start of the process to show how this will be achieved. Master plans should be developed in consultation with the Council prior to the submission of a planning application. Master plans should achieve the following (proportionate to the scale of development): an indicative development layout and phasing and implementation plan; high standards of design that respect the character of the landscape, heritage, adjacent and nearby settlements and built development, reflecting the urban to rural transition with appropriate boundary treatment; make effective use of the site through the application of appropriate densities in terms of scale, height and massing, and its relationship to adjoining buildings and landscape; create a strong sense of place, ensuring the proposed development makes a positive contribution to local character and distinctiveness; plan for integrated development, providing for a mix of housing that addresses the range of local housing needs, and encourages community cohesion; reduce the need for car use and encourage sustainable modes of travel, including provision for public transport, cycle routes, footpaths and bridleways, including the roll-out of 20mph zones across the Borough; a network of permeable and interconnected streets and public spaces which also contributes to the security of the site through appropriate design; measures to mitigate the traffic impacts of the proposed development on the strategic and local road networks; An assessment of the impact of the development on existing and planned infrastructure, and identification of new infrastructure requirements resulting from the development. Measures to ensure timely delivery of new and improved infrastructure. appropriate employment provision and community facilities to serve the new development (including local shops, community halls, schools and health facilities); accessible open space to meet identified local needs and/or increase accessibility to existing open spaces; a green infrastructure strategy, providing an integrated network of green spaces and space for water and associated habitat and biodiversity; facilitate opportunities for local/community led food production either through the provision of dedicated spaces such as allotments, growing space within dwelling curtilages or food based communal landscaping; appropriate measures to mitigate flood risk and ensure that the development is resilient to the potential impacts of climate change; assessment of the potential for energy efficient design including renewable energy schemes; and demonstration of a good understanding and respect for the natural environment, its heritage assets and their setting both within the site and in the wider locality, whether designated or not, and include details of how the natural environment and heritage assets will be conserved and enhanced. A management plan should be produced as part of the master-planning process to demonstrate how infrastructure and community assets will be maintained and managed following completion of development. In relation to the two Garden suburb sites identified in the Local Plan, the Council will expect master plans to adopt 'garden city principles' and demonstrate how the design will achieve enhanced public access to high quality open space. The Council will expect subsequent planning and reserved matters applications affecting smaller parcels of land within strategic sites to accord with the principles established through the master planning. In cases where the balance of consideration indicates that the above criteria have not been satisfactorily addressed the application will be refused.

Additional Evidence Link:

Comment ID **APX660**

Site ref (if applicable): **LP1451**

Person ID: **1130152** Name: **Miss Frances Whittle** Organisation:

Agent ID: Name: Organisation:

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 Garden Suburbs plan has not been carefully considered and does not benefit the local community. The plan causes more harm than good and the time scales for the plan period are not achievable. It is ridiculous to plan building so many houses on this land as the development would destroy so much wildlife and their habitats. There are many walking areas and trees that would be destroyed. The Garden Suburbs plan has not taken into consideration the traffic it would cause and the plan appears to be in the early stages of its developments.

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

Duty to Co-operate Reason:

Suggested Modifications:

I believe it would be much more beneficial to revert back to the proposed plans in 2017 which outlines 60 dwellings at the Land at Bank Top. These plans are not harmful for the local community and they have been carefully considered. The Land at Bank Top plans have many benefits, including improving the local community, and the 60 dwelling plan is likely to raise house prices in the surrounding area. These properties would be much more attractive to families than the Garden Suburbs which would take families away from their current community.

Additional Evidence Link:

Comment ID **APX696**

Site ref (if applicable): **LP1451**

Person ID: **1183060** Name: **Mr William McBurney** 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 write to express my deep concerns regarding the proposed housing development off the road we live in. Having looked at your "Strategic Vision for South East Calderdale" we appear to be living in a different Woodhouse lane!! The photographs depicting typical housing and the entrance to the top of Woodhouse Lane are totally misleading as was the photograph showing traffic on Huddersfield Road. My attached

photographs show a more accurate picture of typical housing in Woodhouse lane. Many residents have to park their car on Woodhouse Lane and this can lead to traffic problems especially in the mornings, afternoons and evenings. Woodhouse Lane is used by traffic going to the industrial estate and is also used as an alternative for Huddersfield Road. Although the maximum speed limit has been set at 20mph, many motorists ignore this. Residents struggle to reverse into their own driveway as speeding cars do not want to wait.

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/5068647><http://calderdale-consult.objective.co.uk/file/5068648><http://calderdale-consult.objective.co.uk/file/5068649>

Comment ID **APX698**

Site ref (if applicable): **LP1451**

Person ID: **1183076**

Name: **Mr John Sharp**

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:

Site LP1451 "" Garden Suburb Woodhouse Lane/Bradley Wood My objection to site LP1451 being included in the local plan are based on the obvious lack of a proper traffic plan to cope with the very large increase in traffic which will be caused by the building of 1,257 houses between Woodhouse Lane and Bradley Wood. It is estimated that even if each house only had 1 vehicle then there would be a further 1,257 vehicles using effectively 2 or 3 already heavily congested access points to the A641. These are along Birds Royd Lane, Daisy Road and the top end of Woodhouse Lane via Shepherds Thorn Lane. Each of these junctions is already very busy on a morning between 8 and 9am and in the afternoons between 3.30 and 5.30pm. A conservative estimate of a further 5,000 plus vehicle movements per day would effectively bring the whole area north of Brighouse town centre to a standstill, which will impact on local businesses as customers struggle to access the town centre or its businesses. There appears to be no solution proposed in the plan which adequately addresses this issue. In the absence of any comprehensive plan which includes an additional junction on the M62 between 25 and 24 at the top end of Woodhouse Lane, all the additional traffic will have to use the above-mentioned access points to the A641. This will cause considerable additional air pollution as well as massively increased waiting times for cars to get onto the A641. This will also have the knock on effect of further slowing traffic entering and exiting Brighouse town centre, a frequently tortuous process as it is. There is also the detrimental effect on the industrial units on Bird Royds Lane where considerable numbers of local residents are employed. If the access issues impact on profits and the ability of the companies there to operate effectively, they may well scale down operations there and move to more accessible sites in other local authority areas. This will impact on

business rates and local taxes for the local authority. It can take anywhere between 2 and 20 minutes to get onto the A641 from these access points at busy times of the day as it is. A further 5,000 plus vehicle movements will inevitably bring the area to a standstill. This will have the further impact of increasing air pollution and damaging the environment, as well as health of local people. The mitigation summary regarding the M62 being a smart motorway ignores the fact that the surrounding roads will be gridlocked and getting to the motorway without a guaranteed new junction (24A) will be extremely slow and painful. I believe that the development of site LP 1451 will also have a detrimental effect on Enterprise zone (site LP1618) for the aforementioned reasons of increased traffic impacting on access through Brighthouse town centre. As a business owner I would think very carefully before locating in either the new enterprise zone or on Bird Royd Lanes existing industrial zone. There are better sites locally in other local authority areas without this access issue. The final aspect is the safety of local residents on already crowded roads. The increase in traffic will impact on the local primary school Woodhouse Primary, as one of the 3 access roads to the A641 goes directly past the school. This is already a busy and potentially dangerous place for the local children and parents when dropping off and picking up on a normal school day. The planned increase in traffic will inevitably make this area a more dangerous place. Therefore I object to this site LP1451 being developed as there is clearly no proper, audited, traffic plan in place which takes into account the large increase in local traffic and its impacts on local businesses, people and the town centre. The National Planning Policy Framework (NPPF) states that local plans should encourage solutions which reduce greenhouse gas emissions and reduce congestion. This plan clearly contravenes the NPPF guidelines, specifically point 109 where development should be refused if there is an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe, which they undoubtedly would. The local plan does not support the following NPPF objectives; OBJECTIVE 2 TO IMPROVE SAFETY AND SECURITY FOR PEOPLE AND PROPERTY OBJECTIVE 3 TO CREATE AND RETAIN HEALTHY VIBRANT AND INCLUSIVE COMMUNITIES OBJECTIVE 6 TO RETAIN, PROTECT AND CREATE A QUALITY, LOCALLY DISTINCTIVE BUILT AND HISTORIC ENVIRONMENT OBJECTIVE 8 TO REDUCE THE EFFECT OF TRAFFIC ON THE ENVIRONMENT OBJECTIVE 9 TO PROTECT AND ENHANCE BIODIVERSITY AND GEODIVERSITY OBJECTIVE 10 TO REDUCE POLLUTION LEVELS AND CO2 EMISSIONS TO TARGET LEVELS OBJECTIVE 11 TO PROTECT AND ENHANCE THE NATURAL, SEMI NATURAL AND MAN MADE LANDSCAPE OBJECTIVE 12 TO ENSURE PRUDENT AND EFFICIENT USE OF NATURAL RESOURCES AND ENERGY OBJECTIVE 13 - TO ENSURE EFFICIENT USE OF LAND OBJECTIVE 16 TO ACHIEVE BUSINESS SUCCESS, SUSTAINABLE ECONOMIC GROWTH, AND CONTINUED INVESTMENT OBJECTIVE 17 ENHANCE THE VIABILITY AND VITALITY OF THE TOWN CENTRES

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 **APX719**

Site ref (if applicable): **LP1451**

Person ID: **1129427**

Name: **Mr Guy Walker**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Inadequate public involvement on strategy within Brighouse for:- The scale of development planned "" 31% increase which is not proportionate. Not consistent with national policy legislation:- The garden suburb allocation at Woodhouse is not sustainable and contrary to National Planning Policy Framework (NPPF) Green belt should only be released in exceptional circumstances, these are not exceptional circumstances especially when brownfield sites have been overlooked in favour of green belt. Sustainability appraisal inadequate to justify garden suburb strategy:- It does not address the sustainability of individual sites. There are discrepancies in the Woodhouse site which is assessed as poor in terms of access.

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

Sound Reason:

Flooding Building on green belt land would lead to significant amounts of surface water travelling downhill putting pressure on flood zone 2, possibly cutting off the main train line and increasing the threat of flooding in the centre of Brighouse and various towns down the river and canal. Infrastructure, Traffic and Air Quality Brighouse is regularly gridlocked due to incidents/accidents on the M62. Junction 24A is deemed essential for the Brighouse and Bradley/Fixby sites but this junction is currently not even identified in the Highway England plan. Site LP1618 "" Employment Zone which is across Huddersfield Road by the motorway would no doubt bring significantly more vehicles with the emphasis being on HGV's possibly from countries with different pollution control limits on vehicles. This site alone could potentially generate another 2,500 journeys, also the nearby proposed development in Kirklees of 2350 houses all adding to the air pollution in the area, this is too much traffic for too small a highway. The junction of Woodhouse Lane, Huddersfield Road and Toothill Lane is already an accident black spot without the additional 2500 plus vehicles a housing development would bring. Woodhouse Lane is a rat run for people going to and from work on Birds Royd, parents from out of the area taking their children to school and those trying to avoid the heavy traffic into Brighouse. Woodhouse Lane gets extremely busy at peak times with vehicle travelling at speeds far in excess of the 20mph speed limit making it dangerous for pedestrians, especially children walking to and from school. There is also on street parking by residents and parents on the school run which makes it extremely difficult for local traffic, delivery vehicles, local buses and refuse collection lorries which regularly block the road. Calderdale is already one of 23 local authorities in England that have not met their air quality targets, yet they are proposing to build 4,000 homes and an employment zone (warehousing) in an air quality management zone so how do they propose to manage the increase in vehicle emissions that will result. Calderdale currently has seven air quality management areas (AQMA) all declared because the annual average concentration of Nitrogen dioxide is being exceeded. The Woodhouse area highways network is not suitable to accept the level of development proposed or the associated construction traffic. Birds Royd is limited by a bridge restriction of 7.5tonne, Woodhouse Lane, Daisy Road, Rycroft Lane and Armitage Avenue are all limited by on street parking, narrow sections of road and blind bends. Heritage England note that the group of listed buildings at Firth House Farm lie within an open rural landscape, likely to have remained unchanged, therefore greatly contributing to their historic setting and enhancing the buildings significance. A Heritage Impact Assessment restricts development from parts of the site and there should be no development around Firth House Farm and the access along Firth House Lane should be protected. Calderdale Council have introduced a different Community Infrastructure Levy (CIL) for Brighouse (£40 a square meter) which is less than half the levy for Hebden Bridge (£85 a square meter) it appears the council are trying to make the Woodhouse garden suburb more attractive to developers at the expense of an improved road system, flooding, schools and other facilities, as this levy is the financial support for the funding of the infrastructure. Is it legal to charge such a reduced rate? Don't Calderdale Council have a duty to get best value for its council tax payers? Why make it more attractive to developers when green belt is already favoured by developers due to it being cheaper to exploit than brownfield sites which have a much higher

transaction costs. The area doesn't lend itself to affordable housing as it is not in easy reach of a train station, bus station, doctors, dentists, shops, amenities and entertainment. Green Belt This area of green belt (LP1451) is key to preventing Calderdale and Kirklees merging. Green belt land to the south within the Kirklees boundary has recently been accepted for release for an urban extension by the Kirklees local plan inspector which lessens the gap significantly making it even more important to protect the remaining green belt to prevent urban sprawl. The benefits of green belt (fresh air, health and wellbeing) far outweigh the benefits of a housing development (congestion, longer commutes and dangerous levels of air pollution which cause respiratory illnesses). Not everyone wants to join or can afford to go to a gym or exercise class so having access to walk in the countryside is vitally important to people's health and wellbeing in helping them to achieve regular exercise. If this land is built on the only remaining open space would be Bradley Woods with restricted access to the general public it cannot be classed as accessible countryside so where would families, ramblers and dog walkers be able to walk, it would mean travelling by car to the nearest countryside in turn causing more air pollution. Green belt not only prevents urban sprawl and flooding, it also has an equally important role in storing carbon, vital economic resources for food security and soil protection, therefore reducing the carbon footprint for the area. Building on green belt land should never be considered when there are brownfield sites available to build on. The masterplan strategic vision fails to provide further technical information needed to determine the impact on the scale and form of development, the developable area or how it meets 'garden city' principles:- - Motorway noise "" what are the impact/buffers needed to be defined? - Land contamination? - Non mains drainage? - Impact on Brighouse AQMA and the impact on air quality and designation as an AQMA at Toothill which is currently being monitored for traffic pollution. - Ecology survey and impact on the wildlife corridor and ancient woodland. - Requirements for health service provisions and early year's provisions.

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

Duty to Co-operate Reason:

The council have failed to show they have met the 'duty to co-operate'. Whilst it is accepted that individual authorities are at different timescales in their delivery plans, the 'duty to co-operate' should have looked at this as an alternative strategy to plan development in a more sustainable way. A larger than locally led approach could provide a more sustainable option with a properly planned new garden village with sufficient room for expansion and the ability to achieve a self-contained and sustainable community in the right location. Clearly these are hard decisions to make and would have implications on green belt. This has not been assessed to support the housing market. Instead we are left with a strategy that will overload the current infrastructure and in the case of Woodhouse' a proposal that will not in any way make a 'positive impact' for the community or location. However, it is evident that green belt is a key strategic constraint on delivering housing needs across West Yorkshire and specifically in Kirklees and Calderdale. However, there appears to have been no in-depth analysis of the issues facing local planning authorities in this respect. There is reference that this will potentially start in the next plan making period. In the meantime, each local authority has focused inwardly and turned to green belt release to achieve their own individual housing numbers. This has resulted in a number of large 'bolt on estates' to settlements in Brighouse and Kirklees which will create significant areas of overdevelopment and overload existing infrastructure rather than sustainable development. The lack of co-operation between the councils will eventually reduce any buffer zone and will result in urban sprawl.

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX720**

Site ref (if applicable): **LP1451**

Person ID: **1183172**

Name: **Mr Harold Denton**

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?: **No**

Sound Reason:

Land is not fit to build on. Land is Green Belt. Drilling Brig has dug down around 20 metres in places and dug 8 holes on this land. And previous potential buyer concluded it is unfit to build on as no solid foundation. Previously this land was used for clay digging. Foundation too soft to build anything on. Risk of pollution from new properties. No big enough school in the area. Would overload doctor's surgeries, there is already enough pollution from the motorway and Huddersfield Road. There is already a lot of traffic risk of sinkholes and properties going under.

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

Duty to Co-operate Reason:

Suggested Modifications:

You would need to dig 20+ metres to get a solid foundation to actually build anything on. The land was drilled around 30 years ago and found no solid foundation under 20 metres. Would not build on this land as is unfit for building purposes.

Additional Evidence Link:

Comment ID **APX726**

Site ref (if applicable): **LP1451**

Person ID: **1183200**

Name: **Mr Kevin McCarthy**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Limited consultation has taken place for such a large significant development. This is particularly the case when considering the relatively late involvement of the Woodhouse element. With a very significant impact on traffic congestion and traffic pollution, there is an absence of any significant degree of "traffic modelling" upon which to comment upon. This is an important omission. The overall plan for house building in Calderdale is excessively focused on the Brighouse/Rastrick area, such as to potentially increase the population by over 30%. The infrastructure could not withstand this. Birds Royd is one particular example of a road which will see a huge increase in traffic as it is on the route from the Woodhouse area into Brighouse town centre. This road is already in a state of excessive disrepair, and it is used currently by a large number of wagons accessing the factory units in that area. I predict that this road will see excessive

traffic creating a huge problem/delays in accessing the A641 (Huddersfield/Bradford Road). The Woodhouse development will take up a large amounts of what are currently "green areas", thereby impacting upon facilities for local walkers, runners, and generally those who wish to enjoy the countryside. Also there will be an adverse impact on local wildlife.

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

Sound Reason:

The plans attempt to put far too many houses into the Brighouse/Rastrick area at the expense of the rest of Calderdale. Halifax, for example is proposed to have a much lower number of new houses yet it is over twice the size of Brighouse/Rastrick. The roads in Brighouse/Rastrick area are necessarily limited in terms of both their volume and where they are placed at the present time. This is largely due to the existence of the canal and river that run through the town centre. One of the intended access roads to the Woodhouse development, Ryecroft Lane, is on a sharp bend where currently there are frequently "near misses" between cars going in opposing directions. This will only be exacerbated in the future. The planned development in neighbouring Kirklees sits directly adjacent to the Woodhouse development. In total, I understood that the aggregate Calderdale/Kirklees plans equate to the astronomical sum of 3000 houses! The roads and pollution factors already referred to will thus be magnified considerably in the Bradley/Rastrick areas near to Bradley Bar. This congestion will impact on transport going to/from Huddersfield, but also to/from Brighouse/Rastrick. I believe that the oft-mentioned Junction 24a of the M62 motorway is not in Highways England plans. Had it been so, then this junction may have served to alleviate some traffic congestion.

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

Duty to Co-operate Reason:

I am unconvinced that Kirklees and Calderdale Councils respectively have disclosed their duty to co-operate as there is no evidence that factors such as air pollution and traffic congestion have been properly assessed in order to take account of the aggregate impact of both the respective proposed developments.

Suggested Modifications:

There should be an increase use of "brownfield sites". There should be greater housing numbers in other areas of Calderdale and less in Brighouse/Rastrick in order to achieve greater balance and proportionality across Calderdale. A detailed traffic plan needs to be consulted upon. A detailed report on projected pollution levels should be produced and consulted upon. The whole "Garden Suburbs" concept is unconvincing and should be given re-consideration. Further detailed work with Kirklees is needed in order to assess aggregate pollution, traffic, wildlife etc implications of the two respective planned developments affecting the Bradley/Rastrick area.

Additional Evidence Link:

Comment ID **APX752**

Site ref (if applicable): **LP1451**

Person ID: **1182505**

Name: **Mrs Janet Jackson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

There has not been enough consultation with the public considering the size of the development planned. Woodhouse was not originally identified, and new sites have been added without proper consultation. There are still people in this area who are oblivious to what is being planned in their neighbourhood. It is not consistent with national policy. The exceptional circumstances for the release of green belt land is not justified. It is not sustainable since Woodhouse is already assessed as poor in terms of access.

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

Sound Reason:

There are a disproportionate number of houses planned for the Brighouse area considering the size of the overall Authority and the percentage of area that Brighouse covers. I am particularly concerned at the existing infrastructure in the town. This is insufficient to deal with the traffic that both the local area and the whole of Brighouse can deal with. That is on a normal day to day basis. If anything occurs on the M62 Brighouse is gridlocked. The town cannot cope with any extra volume of traffic at the moment. On top of this the access to the 'garden suburb' area is along residential streets where there are many parked vehicles. These streets are often used as a 'rat run' when congestion occurs on the main road. It can take my husband up to half an hour to travel 2 miles from the motorway to home. My daughter lives 1.5 miles away and it can take 20 minutes to get to her house on a bad day or vice versa. There is no scheme in place for a potential junction 24A and surely if this was to happen it would use a lot of the area that has been put into the plan for the 'garden suburb' anyway. This plan is not for a 'garden suburb' it is for a blot on housing estate. There is evidence to show that the release of green belt land for this plan is not justified. The estate will not provide benefits that exceed the harm done to the green belt. Why is it that the green belt land in Brighouse is less sensitive than the green belt land in other areas? It has already been identified as most sensitive green belt therefore should be left alone. What green belt will remain is actually the Scout Camp and the whole area is not openly accessible.

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

Duty to Co-operate Reason:

There has been no in-depth analysis of housing needs cross the wider area. It is clear that Calderdale and Kirklees have not considered each other's plans for housing. The 'garden suburb' will only be separated from a further 2000+ houses by the M62 , with all access being along the same already congested roads. A wider approach should have been looked at collectively across both authorities to plan development properly.

Suggested Modifications:

Woodhouse should be removed from the local plan to retain the sensitive green belt. Brownfield sites need to be properly investigated If it was to go ahead infrastructure needs to be fully in place prior to the development

Additional Evidence Link:

Comment ID **APX837**

Site ref (if applicable): **LP1451**

Person ID: **1130382**

Name: **Mr John Andrews**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Consultation - Inadequate public involvement on strategy within Brighouse considering the scale of development planned "" 31% increase which is not proportionate. National Policy - Not consistent with national policy legislation "" Woodhouse'garden suburb' has not been sufficiently defined. No evidence of "garden"" it appears instead to be a massive housing estate without appropriate consideration and planning for the infrastructure "" namely access, roads, schools, green areas, emergency services etc. In addition, new sites that have appeared in the publication draft that have not previously been consulted on in previous iterations of the plan ie Stratton Road site for 24 units (ref LP1000). This makes me question whether correct legal process has been followed on other aspects of this proposed development. Green belt should only be released in exceptional circumstances, these are not exceptional circumstances especially when brownfield sites have been overlooked in favour of green belt. The site currently meets 4 out of 5 of the requirements of Green Belt and prevents urban sprawl into Kirklees. The Green Belt here should be retained. Sustainability Appraisal "" the Woodhouse site scores poorly in terms of access. In addition, air pollution & noise pollution in the area is already high. There appears to be insufficient consideration of the impact of adding 1257 additional homes on the existing residents, nor on the future residents of these proposed new homes, who will be closer to the motorway noise and pollution. The suburb is not within the prescribed walking distance to local amenities in Brighouse such as shops and transport. This will result in a significant increase in traffic as people access these. Brighouse Station has limited parking and is full nearly everyday by 7:30am.

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

Sound Reason:

Access "" the plan does not appear to have taken any consideration of previous concerns raised by local residents regarding access to the proposed development. The side roads off Huddersfield Road are not suitable for additional traffic. They have recently been reduced to 20 miles per hour to improve safety for the children attending the local school, which clearly suggests Calderdale Council had concerns over the safety of the residents and children, but it seems to now have overlooked this matter in its proposal. The roads are very narrow, built in the 1940's when cars were not as prevalent. Residents park on the road as they have limited driveways to park leading to difficult access and danger. In the vast majority of cases developments of this nature approved elsewhere have major new infrastructure to address access issues and have cul to sacs to prevent rat runs through existing small roads. This does not seem to have been addressed in the plan. If access was granted up Ryecroft Lane, traffic would be passing a park which is very popular with children, and then have to navigate a blind bend to enter Ryecroft Lane. Whilst this is not currently an accident hot spot, accidents will happen if traffic is brought into the development this way. Access via Firth House Lane has been commented on by Historic England and if the council is to adhere to NPPF, it is unlikely to be able to use this point either as an access road to the Garden Suburb nor Shepherds Thorn or access off the main Huddersfield Road at Bradley Bar. Development should not be approved until the proposed new M62 junction at Bradley Bar is approved and funded. Without this the traffic from the development and the similar one in Kirklees will have to travel through either Brighouse or Cooper Bridge to access the motorway. Both of these routes are highly congested and suffer high pollution levels which will only increase. The impact on health from high pollution levels is well documented. Calderdale does not appear to have addressed these issues. Drainage "" the site is a key run off for flood water into the river Calder. No evidence has been presented on how this will be managed. There are a number of natural springs in the site and it is often flooded after rain preventing significant run off into adjacent properties Wildlife and amenity "" If this site was developed a significant local amenity would be removed. This area is used by residents for walking etc and there are no other local areas that could be used. It is also a haven for wildlife, birds, bats, fox etc are all to be found in the proposed area. Positively

Prepared "" the plan does not seem to address where all the new residents will come from in the area. This and other developments create a significant new housing stock in a small geographic area. How has the council determined the demand, the impact on current property prices. It would be more rationale to build evenly across the whole authority area where people currently live and want to live. It seems that Brighouse has a disproportionate amount of the development and together with Kirklees Bradley Bar development will create a huge amount of new housing in a very tight geographic area with no proven demand at this level. It is likely that many residents will travel to Leeds for work and therefore the size of the developments is more speculative to pull new residents from other areas rather than providing housing for local needs. Local needs would be best satisfied by spreading development evenly across the Calderdale area, most notably Halifax as this is the major urban area.

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

Duty to Co-operate Reason:

Calderdale Council and Kirklees Council have not demonstrated any consideration each others plans. They have worked independently of each other despite the fact that Kirklees plans for 2000+ houses border Calderdales plans for the Woodhouse Garden Suburb sharing the same access and infrastructure and routes to the M62 via Brighouse.

Suggested Modifications:

Remove Garden Suburb from plan and retain as Greenbelt

Additional Evidence Link:

Comment ID **APX943**

Site ref (if applicable): **LP1451**

Person ID: **1183544**

Name: **Mr Mark Edgar**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Notification and Consultation As a resident of the Woodhouse estate I must argue that the consultation from Calderdale Council regarding the new Garden Suburbs has not met the required legal compliance for both locally impacted residents and the wider Brighouse community. As such Calderdale Council have obtained inadequate public participation and feedback. The key local communications regarding this development have all been conducted by the residents of Woodhouse through the form of letterbox flyers and private local meetings. Given the sheer scale of the proposed local development within Brighouse, the failure to deliver these adequate levels of notification and engagement with the local community are completely unacceptable. It should be noted that further sites have appeared in the draft, such as the Stratton Road site for 24 units (ref LP1000) that have not previously been consulted on. Based on the above I argue that the current draft plans have not followed legal compliance and that this should be examined by the Central Government Inspector before any other considerations are reviewed. Consistency with National Policy and Legislation Calderdale Councils Garden Suburb strategy does not appear to be sustainable due to the inadequate local infrastructure and extremely limited access to the Woodhouse site. The strategy therefore is contrary to the NPPF - Greenbelt Policy. Calderdale Council has not identified within this Draft Local Plan the exceptional circumstances that warrant the release of Garden suburb area at individual sites such as Woodhouse.

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

Sound Reason:

For the use of Green Belt land, Calderdale Council must provide robust justification in their as of yet unpublished 'Exceptional Circumstances'. They must evidence that utilising this space will deliver the intended scale of development to a realistic and sustainable level for the existing local population in both the present timescale and the future. Judging on the comments delivered by other residents, road access issues to the proposed Garden Suburb site at Woodhouse appear to be continually ignored. As a resident of Woodhouse and a daily commuter outside of the Calderdale area it is apparent what impact the increment of almost 1257-3000 additional vehicles (This figure is based on each of the households having 1 to 2 vehicles) will have on the immediate area; especially as no further road networks are planned. The commute time between work and home for a high proportion of residents, including those of the planned Garden Suburb if approved, would be greatly increased from current levels, making a currently desirable place to live and raise a family to one that is avoided. As the current plans have no identified solution to alleviate this concern I would recommend any development of the Woodhouse Garden Suburb is delayed pending confirmation of the design and impact of the M62 24a strategic highway junction improvement scheme and the development of the local road network. The increment of almost 1257-3000 additional vehicles around the local area, especially those at standstill due to traffic congestion, will guarantee an increase in air pollutants and yet Calderdale Council has already been identified as one of twenty-three local authorities in England that have not met their Air Quality targets. The addition of 1257 homes in the Woodhouse area and a combined 4000 homes in the Brighouse area, the majority of which are at the expense of our Green Belt land, do not lend themselves to tackling the Council's commitment to reducing Air Pollution around Calderdale. As it stands the proposed plan would see a disproportionate number of homes built within a small area of Green Belt land that buffers the M62 corridor from the residents of Brighouse. The European Union sets safe nitrogen dioxide (NO₂) levels at an average of 40ug/m³ (micrograms per cubic metre) and although Brighouse has received a marginal decrease from 51ug/m³ to 49ug/m³ can it be confirmed how this can be further improved towards the safe targets in Brighouse given the proposed development? As a local resident and Dad to three Children I am highly conscious of unmanageable increases to air pollution, and whilst I understand the need for more affordable homes (Which LP1451 does not deliver incidentally) and the resulting vehicle increases on the area I cannot accept that Brighouse out of all the Calderdale Region has taken a disparate number of these new homes and must therefore suffer under a highly multiplied air pollution intake. The DEFRA report on air quality identifies that the two main causes of lung disease are smoking and air pollution. Previous reports have identified that Calderdale has one of the highest rates of premature death due to respiratory disease. As a resident of Woodhouse, the building of the planned development will only increase this, and this is something that we should not be subjecting our children or residents too. Calderdale Council's primary focus should always be the wellbeing of its residents, not the targets set by Central Government or the benefits received from property investors. Calderdale Council has previously identified the Woodhouse Garden Suburb (LP1451) as a most sensitive Green Belt. The Council's Green Belt site survey form specifies categorically that the site WOULD: potentially lead to ribbon development with a high potential for unrestricted sprawl lead to the coalescence of towns. not safeguard the countryside from encroachment harm some heritage assets

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

Duty to Co-operate Reason:

There appears to have been no in-depth analysis of the issues facing local planning authorities. The Councils of Calderdale and Kirklees appear to have not considered each other's plans for housing as the Woodhouse Site (LP1451) Garden Suburb will only be separated from a further 2000+ houses in Kirklees by the M62 motorway, with all access being along the same already congested roads. The immediate

proximity of developments of this size further compound the arguments detailed above.

Suggested Modifications:

Modification: Woodhouse Site (LP1451) should be removed as a Garden Suburb housing site and retained as Green Belt. The proposed plan is not deliverable as the site access is completely inadequate, the impact on heritage and ecology assets would be irreversible and the detrimental impact on the surrounding residential area would be profound. Although less appealing to property investors and builders, a wider dispersal of housing across the Calderdale borough, ideally on Brown Field sites would see a more even distribution of the air pollutants. Another option for Calderdale Council is the development of a new village/township that is separate to all existing developments. In Barnsley, South Yorkshire, a new development called Woolley Grange was established on the edge of the Borough and has now become a thriving community in its own right. In my view the benefits of developing this type of new site are: Separate road networks Minimal impact of the building works More flexible site boundaries Minimal impact to the existing road traffic (So long as the access roads to the M62 are not via another town) Creation of new communities as opposed to the destruction of existing Existing Calderdale residents are placated whilst the Council still delivers on its commitment for new homes Modification: A combined West Yorkshire led approach could provide a more sustainable option of a new village/township development with enough room for future expansion.

Additional Evidence Link:

Comment ID **APX957**

Site ref (if applicable): **LP1451**

Person ID: **1183584**

Name: **Mr Richard Ribeiro**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Disproportionate Development Brighouse getting a disproportionate amount of housing development within Calderdale. Halifax much bigger (3 times) but taking less housing. Can see that proximity to M62 will be a factor but impact and demands placed on relatively small town of Brighouse will be significant. Infrastructure Brighouse already suffers as a bottleneck for traffic at peak times. This is due to route limitations due to rail line and river/canal. I personally commute to Wakefield 5 days a week and am regularly held up trying to traverse Brighouse at the start/end of my journey. The current traffic load is high and the addition of over 3000 homes will only make traffic load in Brighouse worse. Presumably many of the new homes will have two cars and many of these will be trying to access and return to/from the M62. There are already long tailbacks on Wakefield and Huddersfield roads. It seems common sense to say that Brighouse can't and won't cope with an increased traffic load. I do not believe that a new junction from the M62 will help or indeed that there are many options to improve infrastructure. Schools and GP's are already overrun in the area and would not cope with planned expansion on this scale. Air Quality It is my understanding that air quality is already compromised in Brighouse. It is difficult to see how air quality will be improved with the addition of so any additional homes and cars. Flood/Surface Water I am concerned about the impact of developed land on water drainage and the steps which may be necessary

to mitigate this. Ecology I am concerned about the impact of development on the local wildlife. There could also be an impact on local bat colonies. Summary Many people in the area including myself are staggered by the proposed scale of development in Brighouse. It appears to be over ambitious in the extreme! The additional housing would be added to the significant detriment of the town and surrounding areas.

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

Duty to Co-operate Reason:

I am not confident that the plan has taking into account proposed development on the other side of the M62 off Bradley road.

Suggested Modifications:

Evidence that concerns have been taken into account following consultations. We are letting you know we feel that the scale of the proposed development is too much for the area. Please pay attention to this. Reduce scale and number of proposed dwellings in Brighouse area and look to improve infrastructure.

Additional Evidence Link:

Comment ID **APX983**

Site ref (if applicable): **LP1451**

Person ID: **1129643**

Name: **Miss Kathryn Hudson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Lack of public involvement when considering the scale of the planned development. The resulting 31% increase in the population of Brighouse is not proportionate for the size of the town. The plan contradicts the NPPF for green belt release as the exceptional circumstances are not justified. Community Infrastructure Levy - this has been set very low (much lower than the national average) to attract contractors. How can the council offer the land at this reduced levy at the expense of an already creaking infrastructure. This surely contravenes many of the objectives of the plan to maintain a healthy and safe community.

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

Sound Reason:

I object to the LP1451 site being developed for the following reasons: Unsustainable growth strategy: is there evidence that there is a need for such a disproportionate amount of new homes in Brighouse? The Woodhouse site has been assessed as poor in terms of access. The NPPF clearly states that the local plan should encourage solutions to support reductions in greenhouse gases and reduce congestion and air pollution. The proposed number of houses along with the houses planned just over the boundary in Kirklees with significantly increase levels of already high pollution in the area. Our green belt land is so important as it is a 'green lung' replenishing much needed air supplies. The resulting extra thousands of trips by car each day as a result of so many new homes can only have a detrimental effect on air pollution, congestion and the condition of our roads. Woodhouse Lane is already used as a 'rat run' at rush hour and the junction of Woodhouse Lane and Toothill Bank is already an accident black spot. Brighouse regularly

gridlocked when there is an accident on the M62 and motorists leave the motorway junctions at Brighouse and Ainley Top. How any of the above support the objective of the plan to: Create and retain health vibrant and inclusive communities- objective 3 Improve accessibility to essential services, facilities and employment - objective 5 LP1451 being included in the local plan will form part of a negative cumulative effect for the local area and its residents.

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

Duty to Co-operate Reason:

Has the council fulfilled its duty to cooperate with neighbouring councils? Kirklees has plans for another 2000 homes very close to the Woodhouse site. This will cause a blurring of the boundaries between Brighouse and Huddersfield.

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX994**

Site ref (if applicable): **LP1451**

Person ID: **1129992**

Name: **Mr. Brian Whitaker**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Although time limits may be set to review from time to time areas of greenbelt land, this does not mean that its status should change. The need for greenbelt land around Woodhouse lane and Bradley wood remains the same. It is designated to prevent urban sprawl protect the wood and historical significance of the area. Particularly with regards to the merging of Calderdale and Kirklees.

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

Sound Reason:

This area of greenbelt land is designated to prevent urban sprawl and merging of the two councils boundaries. The plan does not take in to account the necessity to maintain this greenbelt space and the detrimental effect developing this land will have on the surrounding are in terms of:- Significant traffic impact on already congested single lane roads. Air quality - such large development close to the motorway and the traffic it will create, will impact on the air quality of the area. Additionally, noise pollution will increase without the greenbelt. Water run from this area and potential flooding in to the lower land of the valley. Ecology - Detrimental impact on will have on water courses/streams etc. across the greenbelt. The effect it will also have on the habitats of the wildlife and birds, bats, and vegetation. The plan should have more emphasis on creating new homes from brown field sites and small areas of land, which would not have as significant an impact on designated greenbelt areas. Greenbelt areas should not be considered until other such areas have been developed and a better understanding of the number needed. The plan should create housing in all areas across Calderdale and not allocate housing disproportionately in one area, causing all the issues highlighted above. Doing creates a need to consider Greenbelt land for such large developments. There needs to be much more consultation about this and the housing plan as a whole. It swallowing up our greenbelt for such large developments should not be considered at this stage.

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

Site ref (if applicable): **LP1451**

Person ID: **1174900**

Name: **Mr Ian Bull**

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

Site ref (if applicable): **LP1451**

Person ID: **954585**

Name: **Jean Russell**

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: <http://calderdale-consult.objective.co.uk/file/5080979>

Comment ID **Lpp1054**

Site ref (if applicable): **LP1451**

Person ID: **1134638**

Name: **Mr Ken Kidman**

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/5080979>

Comment ID **Lpp1055**

Site ref (if applicable): **LP1451**

Person ID: **1134633**

Name: **Ms Rita Kidman**

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/5080979>

Comment ID **Lpp1056**

Site ref (if applicable): **LP1451**

Person ID: **1182924**

Name: **Anna Russell**

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/5080979>

Comment ID **Lpp1074**

Site ref (if applicable): **LP1451**

Person ID: **1182310**

Name: **Mrs Chris Dawson**

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/5081661>

Comment ID **Lpp1098**

Site ref (if applicable): **Lp1451**

Person ID: **1130648**

Name: **Mr Alan Sparks**

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:

The proposal to build garden suburbs in Woodhouse and Clifton will blight the lives of the current residents of these areas. 1. The residents of Brighouse are being obliged to accept the bulk of the proposed development in the Local Authority with Halifax and other areas in the Calder Valley being asked to contribute a disproportionately smaller percentage. 2. The proposals fail to adequately address infrastructure requirements and where they are mentioned they appear to follow housing development rather than precede it. 3. Brighouse in general and Huddersfield Road in particular are frequently gridlocked due to incidents on the M62 primarily because the bridges across the River Calder have inadequate capacity. Anchor Bridge was build for a bygone era and is the cause of regular queues at peak times. Huddersfield Road bridge leads to the Town Centre so that traffic trying to avoid the M62 mixes with local traffic creating queues from the Town Centre back in the direction of Bradley roundabout. 4. Woodhouse Lane is a "rat run" to the industrial/commercial properties in the Birds Royd area with the 20mph restriction almost totally ignored. Building 1,247 houses in Woodhouse will massively increase the traffic problem in the area. It may be argued that a Smart Motorway from J20 to J25 will help to reduce the frequency of incidents on the M62 so alleviating the Huddersfield Road issue. Against this must be set the massive development proposed by Kirklees on the opposite side of the M62. Furthermore, the proposed new M62 junction at Bradley will direct even more traffic onto Huddersfield Road. A solution is required to the traffic issue in and around Brighouse by building a high capacity bridge across the river, canal and railway and by-passing the town of Brighouse with a new dual carriageway. Without a solution along these or similar lines the proposals are not fit for purpose.

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 **Lpp1124**

Site ref (if applicable): **LP1451**

Person ID: **958918** Name: **Adrian & Ruth Ferris** 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:

Traffic As a Woodhouse resident the increase in the amount of traffic in our area and Brighouse as a whole without any planned change to the road infrastructure is complete madness. We see Woodhouse Lane being used as a rat run on a daily basis by people using it as a short cut to avoid the often long queues of traffic down Huddersfield Road (not at all adhering to the 20 mph speed limit). In addition if there are any hold ups/accidents on the M62 the situation has a significant impact on local roads around Brighouse and the situation is made much worse. With the average new householder having at least 1 vehicle if not 2 and the proposed Kirklees development for over 2000 houses less than a couple of miles away there would be far too much traffic on the local roads to be able to cope. Also the proposed site for LP1451 will remove the "green lung" that is present to keep air quality under control in our area and the pollution caused by all these additional vehicles would be detrimental to the health of local residents with Calderdale already being 1 of 23 local authorities in England that have not met their air quality targets. Local services Local health services are already stretched to capacity in Brighouse with people often struggling for appointments with their doctor's surgery and unable to access NHS dental treatment. Similarly the local Woodhouse Primary School and Carr Green Primary School are full often with a waiting list of students. The impact this amount of new properties/residents would have on the local services needs to be considered in further detail. Loss of greenbelt land The loss of this greenbelt land would mean a loss to wildlife and recreational use. At present the greenbelt land provides a gap between large built up areas, however this would not be the case if the proposed plan were to go ahead taking into account Kirklees' plans for over 2000 new homes on a neighbouring 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 **Lpp1127**

Site ref (if applicable): **LP1451**

Person ID: **953986** Name: **Mr Matthew Nicholson** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

See attachments

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

Sound Reason:

See attachments

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

Duty to Co-operate Reason:

See attachments

Suggested Modifications:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5084421><http://calderdale-consult.objective.co.uk/file/5084420>

Comment ID **Lpp113**

Site ref (if applicable): **LP1451**

Person ID: **956386**

Name: **Mrs E Collier**

Organisation:

Agent ID:

Name:

Organisation:

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 The residential roads serving the Woodhouse area are already at capacity and congested with on street parking of vehicles, The roads close to Woodhouse primary school become particularly congested at school drop off and pick up times and can become impassable at peak times. The current residential roads and associated junctions would be unable to cope with an increase in traffic from this new development, and would be unsuitable for construction traffic. The main arterial routes serving this area are already at capacity and are congested and subject to delays particularly at peak travel times. The area is already known to be one with problems of congestion on commuter routes, which will only be made worse by the addition of more cars from the proposed development. Ecology The green belt land is home to wildlife and contains a designated wildlife corridor which will be lost if the area is built upon. Local residents greatly appreciate seeing this wildlife in what is a predominantly urban area. Open Space Building on this green belt land will result in loss of open space for people to enjoy visually and use for leisure purposes. The ability to access a countryside setting straight from their house is greatly valued by many residents who enjoy using the space for family walks, exercise, dog walking etc. Responsible councils should be encouraging communities to exercise by ensuring opportunities are available for such activities. Increased housing in the area will put pressure on remaining open spaces such as the Woodhouse play area, leading to them becoming overused and crowded at peak times. Environmental Health Increased traffic in the area will result in raised air pollution levels, the area is already subject to concerns regarding pollution with Air Quality Management Area designation already being discussed before the development is even started. There will be an increase in noise pollution and disturbance in the area due to increased traffic from construction vehicles and building works, and eventually from the increase in vehicles owned by residents of the housing development. The new houses will be built very close to the M62 and will therefore be

undesirable with regarding to noise and air pollution from the motorway. There will be increased pressure on the mains drainage in the area once the new houses are built, which could lead to undesirable effects with regards to flooding and sewerage if current systems are overwhelmed. Flood risk in the area will be increased with the loss of green field sites which soak up water currently, preventing run off into built up areas. Accessibility There is a complete lack of regard for the capacity of current infrastucture to cope with the proposed number of houses. All current NHS provision is running at or over capacity - yet there seems to be no proposal to commission new dentists, GP's or other healthcare services in the plan for the area. The nearest local primary school to the development is already oversubscribed, and whilst the plan states there are plenty of other primary schools within an acceptable 'as the crow flies' walking distance, in reality they would be out of realistic walking distance for many parents with small children who would be required to use safe walking routes. The plan also highlights that with current provision secondary school provision would not provided be within acceptable walking time. Many of the walking times to shops, train station, bus station, NHS services etc stated in the plan may be achievable for an active adult, but there would be accessibility issues to services from the furthest reaches of the site in particular for people with slower mobility. Green Belt This is a designated green belt area and should be protected from development, once lost, this habitat can never be recreated. there should be further consideration of brownfield sites, and regeneration of unused 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 **Lpp1135**

Site ref (if applicable): **LP1451**

Person ID: **1124992**

Name: **Mrs Anne Broadbent**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

See attachment

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

Sound Reason:

See attachment

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

Duty to Co-operate Reason:

See attachment

Suggested Modifications:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5084675>

Comment ID **Lpp1146**

Site ref (if applicable): **LP1451**

Person ID: **1125055**

Name: **Mr John Logan**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

1. Local Plan Preparations In preparation of the Local Plan process, the Council carried out a Review of the Green Belt in 2016, as an essential element in the gathering of evidence for any proposed changes. The National Policy Planning Framework (NPPF) requires changes to the Green Belt to be made through the Local Plan process. This should include: i. Demonstration of exceptional circumstances, such as unmet housing or employment land needs, that cannot be met elsewhere; and ii. Consideration of the need to promote sustainable patterns of development, considering a range of local, regional and national issues such as economic growth, health and wellbeing, accessibility and biodiversity, cultural heritage and climate resilience, as well as an assessment against Green Belt purposes. The scope of the Review was to assess the Green Belt against the 5 key purposes of Green Belts as determined by the NPPF and they constructed a scoring system where: 'Parcels that meet 3-5 of the identified purposes have been assessed as 'most' sensitive and it is proposed that these parcels will be retained in the Green Belt. The remainder of the parcels, meeting 0-2 of the identified purposes, have been classed as 'mid sensitive'. These are the parcels that should ideally be taken forward and considered for detailed study.'

2. Summary of the Calderdale Green Belt Review 2016 Generally, the parcels to the eastern side of the district contribute significantly to the purposes of Green Belt due to a combination of good inter-visibility and close proximity between large built up areas. These land parcels play an important role in helping to prevent the urban areas from merging. In addition, many of these parcels contain few significant boundaries and the land within them would be vulnerable to encroachment and sprawl. In general, parcels to the western side of the district do not perform as strongly as those to the eastern side. In many instances, the parcels form part of large gaps between towns, so that the merging of neighbouring towns is more limited. However, many of these parcels still have high potential for sprawl and perform an important role in safeguarding the countryside from encroachment.

3. Council's Assessment Summary for Site Reference LP1451 Number of Puposos Fulfilled Meets 3-5 of the identified purposes (Recommendation to retain in the Green Belt) Council's Comments Parcel performs well when assessed against five Green Belt purposes. Greenfield land with agricultural use. Site is bounded by M62 and District boundary to south. Parcel adjacent to Woodhouse.

4. My Comments This parcel of land contains the best agricultural land in the Calderdale District as demonstrated by it being used for growing cereal crops and the proposed development will also result in building on the Green Belt right up to the District boundary between Calderdale and Kirklees. A key element of the Green Belt is 'to prevent neighbouring towns from merging into one another' which should be avoided for towns within a Council but the proposed Local Plan not only contributes to a merger of towns but does so by merging towns within two different Metropolitan Councils. The Council's key stated objectives of the proposed Local Plan contain: Promoting sustainable local food production; and Reducing travel demand, traffic growth and congestion through the promotion of sustainable development and travel modes. The inclusion of this parcel of land in the proposed Local Plan does not accord with either of

these stated objectives. Furthermore, the Council in its summary of the area of Green Belt now and following the proposed Local Plan has produced the following table: Impact on the Green Belt and Countryside Change to Green Belt (ha) Existing Local Plan Difference % Area Around Todmorden 8,769 8,769 0 0.00 Green Belt 22,821.5 22,414.9 406.6 1.78 Footnote: It is important to note that the change to the Green Belt and countryside noted above also include the existing village envelopes which will be inset within the Green Belt and some amendments to Green Belt boundaries required for tidiness. In view of this loss of Green Belt and countryside directly resulting from development proposed through the Local Plan is only 0.96%. 5 Conclusion So: - given the size of the Green Belt area within the Council Boundary and the unmet housing demand requiring only 0.96% of that area; - the key stated objective of promoting local food production; and - the findings of the Green Belt Review in relation to its own assessment against the 5 Green Belt purposes, I cannot see that the Council has demonstrated the necessary exceptional circumstances required by the NPPF to remove this parcel of land, Site Ref.1451, from the protection of the Green Belt. Therefore, I consider that the proposed Local Plan does not satisfy the 'test of soundness' as it is not evidence based.

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

Duty to Co-operate Reason:

Suggested Modifications:

The Council needs to re-examine their considerable area of Green Belt to achieve their 'unmet housing need' within the National Policy Planning Framework as their current proposal, in relation to Site Ref. 1451, does not evidence the necessary 'exceptional circumstances'

Additional Evidence Link:

Comment ID **Lpp1394**

Site ref (if applicable): **LP1451**

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 LP1451 and LP1463 Garden Suburbs, Brighouse The exceptional circumstances for these major Green Belt changes have not been demonstrated. They would enable an unsustainable pattern of settlement with poor public transport and active travel accessibility, generate significant road traffic, skew the location of new housing away from centres of employment and undermine re-use of brownfield land. There would be significant loss of openness, and ecological and heritage impacts; these could potentially be partially mitigated by reduced quantity of development combined with Local Greenspace Designations, but such measures have not been proposed. The dependence on these two sites for the overall housing delivery in the Plan period is unrealistic, unsustainable and damaging to the soundness of the Plan.

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 **Lpp1412**

Site ref (if applicable): **LP1451**

Person ID: **1185995**

Name: **Persimmon Homes (West Yorkshire)**

Organisation:

Agent ID: **1185997**

Name: **Mr Adam Jackson**

Organisation: **Senior Planner Lichfields**

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

Undevelopable Allocations In addition to the significant shortfall in delivery which we anticipate will occur at the Garden Suburb sites, our analysis has highlighted a number of other proposed allocations which we believe are not developable. LP1463 Based on a proper application of the Start to Finish research, it is considered that the combined plan period yield from both Garden Suburb sites will be 1,484, at most. This represents a shortfall of 1,762 dwellings, and, as the PDLP does not have a sufficient flexibility allowance, would mean that the Plan would fail to meet the identified housing requirement. The PDLP is therefore not positively prepared and the approach is unsound. See attachment for context of comment.

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

Duty to Co-operate Reason:

See attachment

Suggested Modifications:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5106413>

Comment ID **Lpp1427**

Site ref (if applicable): **LP1451**

Person ID: **1185621**

Name: **Clifton Village
Neighbourhood Forum**

Organisation: **Clifton Village
Neighbourhood Forum**

Agent ID: **1185607**

Name: **Mr Nick Pleasant**

Organisation: **NJL Consulting**

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

Legal Compliance Reason:

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

Sound Reason:

See attachment for context of comment. Our previous representations (in 2017) are enclosed and the concerns raised in these representations remain, (previous representations at Appendix 1). The sites are supported by individual site assessment reports which consider site constraints and required mitigation. In the case of the Thornhills site (LP1463), the updated site assessment fails to adequately address a range of site specific issues in the previous Draft Local Plan and raised our subsequent representations to that draft. In summary, considering the previous representations and the evidence now presented to support the Publication Draft Local Plan: The sites are in the most sensitive area of Green Belt and no justification is given for their release; In particular, lower population projections indicate the proposed major housing allocations at Thornhills and Woodhouse are no longer required; Notwithstanding, major housing in this location will simply serve those working in Kirklees (Huddersfield) and other more distant locations such as Leeds, Bradford and Manchester, and therefore result in wholly unsustainable patterns of growth; The sites will exacerbate existing congestion, with no readily implementable solution "" for example there is no evidence the necessary local highways infrastructure, such as improvements to relieve acute congestion on the A641, A643 and A644 can be delivered; There is equally as little certainty on essential strategic highways works to M62 J24, J25 and proposed J24a, all of which likely require Highways England funding. Highways England have confirmed no funding is available; There is a clear correlation between existing congestion (in the A641, A643 and A644 corridor) and areas of poor air quality, particularly in the Brighouse AQMA, and further development in this location will further exacerbate poor air quality; The proposed build-out rates are entirely unachievable due to land assembly, the need for up front early significant infrastructure, on site delivery of sustainable urban drainage solutions, developer funding, uncertainty of ground conditions including extensive historic mine workings, and viability concerns; Development is potentially unviable unless affordable housing policies are ignored and an almost zero CIL rate is applied; The sites contain valued ecological areas, including designated habitat and notable species such as Schedule 1 Species which have protection under the Wildlife & Countryside Act 1981 and associated high conservation priority; Therefore the promotion of these sites is entirely at odds with the Local Plan Strategic Objectives. The proposed allocations are entirely unsound

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

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5107469>

Comment ID **Lpp16**

Site ref (if applicable): **LP1451**

Person ID: **1179129**

Name: **Mr Ian Carruthers**

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:

Housing plan at Woodhouse and Stratton Road I live with my wife and 2 children near to the area where the houses are planned. i bought my house 6 years ago. i have invested aroun £40.000 in my home. My children attend the local school and my wife and I work in public service. My children use the Bradley woods area regularly to just be children and get some fresh air. The reason we moved was the semi rural nature of this area. i know from my neighbours who are strongly apposed to this plan will consider selling and moving. There are areas of derelict land everywhere and empty houses in disrepair. These houses are a money making project. I can already see people putting their houses up for sale. West yorkshire is becoming a mess of housing estates roads and small retail parks. where are we supposed to live?? Again the council have failed us.

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 **Lpp17**

Site ref (if applicable): **LP1451**

Person ID: **1179133**

Name: **Mr Martyn Turner**

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 write to register our objections to the proposed housing development LP1451, between Woodhouse Lane

and Bradley Woods of 1257 houses. Firstly, as we live in this area, we know too well how busy Huddersfield Road is leading into Brighouse on a daily basis, especially at peak times and the rush hour. If you were to add to that potentially the number of cars from the proposed new houses, then I know you will only serve to exacerbate the already heavy congestion. The queues often tail back up to Bradley Bar roundabout and the pollution levels must sore with all that standing traffic. This would only worsen with further adding traffic and a lack of increased road infrastructure. The local bus services would struggle, schools would not be able to cope and the local medical centres are already at breaking point, without adding any further numbers. Beyond the obvious, the area would be spoiled as it is currently open rolling fields, which is why people move here in the first place. I would strongly ask you reconsider your plan, or significantly reduce the number of dwellings accordingly.

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 **Lpp179**

Site ref (if applicable): **LP1451**

Person ID: **960452**

Name: **Ms Madeline Brook**

Organisation:

Agent ID:

Name:

Organisation:

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 have lived in Brighouse all my life and want it to continue to be a thriving town. I would support some new housing development however the local plan as it stands is not fit for purpose based on the following areas: Pollution: I walk in the fields proposed for site LP1451 everyday with my dogs. The area is rich in wildlife with deer, foxes, rabbits, owls, pheasants and a real diversity in birdlife in the ancient hedgerows. Whilst walking up Firth House Farm Lane, Shepherds Thorn Lane the noise from the motorway is considerable. With noise comes pollution, whereas the fields, tree's and hedgerows may absorb some of these harmful pollutants when this is effectively concreted over to build the mass housing, the trees etc will not be there to absorb it and therefore make our air pollution even worse. Calderdale council are one of twenty three councils in England to never hit pollution targets, Brighouse with its proximity to the motorway and existing congestion, would only worsen with the current plans. A recent report claimed there will be an extra 27500 premature deaths per annum by 2020 as a result of traffic pollution. Is mass family housing so close to the M62 something to be recommended given what we know about the harmful effects of traffic fumes. Of the 9000 homes proposed for the Calderdale Local Plan 4500 are planned for Brighouse area, given our relatively small size, this seems massively out of proportion. There are approximately 32000 residents in the Brighouse area. If we take an average number of residents as 3 per property, that would mean an extra 13500 people living here, a 42% increase. Of those households we can assume an average of 2 cars, so an extra 9000 cars would be circulating our already choked and congested

road network. Which brings me onto my next point: Infrastructure: As any resident who drives through Brighouse knows, it is a nightmare for congestion (as our air pollution levels show). The infrastructure needs upgrading for the existing population, let alone the mass building. To facilitate these extra journeys it will require Huddersfield Road widening to dual carriageway, however there will still be the 'bottleneck' of getting over the Huddersfield Road Bridge over the Calder. Daisy Road, Armitage Road, Woodhouse Lane would need to be treated as Main Roads. At the moment those roads are like a slalom of cars parked on the road with mornings and teatimes being particularly busy as the factories on Birds Royd shifts start / end cars use this route as a 'rat run' to avoid the gridlocked Huddersfield Road. If residents aren't able to park outside their homes what compensation will be offered for their lack of amenity? There is also a lack of school places and medical provisions in the area the plans do not offer any details on how the increased demands would be met. The council also seems to be underselling our area in terms of the Community Infrastructure Levy which would help fund some of the infrastructure requirements at £40/sqm against the usual £85/sqm. Green Belt: The proposed site of LP1451 is currently designated Green Belt Land. From the plans as it stands at the moment, it appears that every bit of green space in the Brighouse / Clifton area is to be converted to housing. Whilst I don't expect everything to stay the same, it would be nice to think there would be some moderation in the council thinking to ensure there were some green areas to still enjoy and not have to get in the car for yet another journey to walk the dogs!

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

Duty to Co-operate Reason:

I also believe there has been a complete failure by the council to discharge their duty to co-operate. I will use one example. The proposed site at LP1451 of 1250 homes and Kirklees councils plans to build 1800 on the Bradley Golf Course site. These 2 massive 'garden suburbs' will be separated by a thin strip of land and the M62 Motorway. The Kirklees Bradley area and Calderdale Woodhouse Area will therefore be one massive Urban Sprawl. In effect it is not just the 4500 homes planned for Brighouse but the c2000 at Bradley too which will be a massive strain on our infrastructure. With Bradley Scout camp uncomfortably sandwiched in between compromising the enormous benefits this facility has for children experiencing (for generations) the great outdoors in ancient woodland. With no registered infrastructure upgrades on the West Yorkshire Combined Authority website, how on earth is anyone expected to travel around the area without it completely seizing up?

Suggested Modifications:

Additional Evidence Link:

Comment ID **Lpp19**

Site ref (if applicable): **LP1451**

Person ID: **1179157**

Name: **Pat Whitehouse**

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 have a number of concerns regarding the proposed development. Principally these relate to the additional strain placed on already overstretched local infrastructure. 1 Roads - Brighouse is already at near standstill for ever lengthening periods of each day. In particular, it is nearly impossible to exit Birds Royd Lane (whose surface moreover is already in a disgraceful condition). 2 Trains - It is impossible to park at the railway station after 8am. 3 Schools - How many additional children are you anticipating? Where will you provide these extra school places?. 4 Doctors - I understand that this is not your direct responsibility. But general practices in Brighouse are already at breaking point.

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 **Lpp20**

Site ref (if applicable): **LP1451**

Person ID: **1179161**

Name: **Ms Keren Wild**

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 would like to voice my views, and would like some answers as to how the above can be even contemplated and I ask that these views are taken into account: 1 - Bird Royd lane is not an adequate road and cannot take anymore traffic, you only have to look at the state of the surface and the way it is used by traffic going to the businesses. Can you please tell us if they build more houses up at Woodhouse what is the intention with Birds Royd lane? The amount of houses that are being proposed, would suggest that another 2000 cars would be trying to get through Brighouse on a morning and an evening which is already very congested. The proposal will also increase the traffic down Woodhouse Lane which would put residences at risk, especially with the School and Park in this area. Woodhouse Lane most of time is in passable due to residents parking. At times emergency vehicles cannot get through. These plans put people at risk, plus vehicles. 2 - Woodhouse Lane would have to be used for all the lorries for the building of houses. Taking point one into account. Lorries of 7.5 tons cannot go over the bridge on the end of Birds Royd Lane, so they would have to use Woodhouse Lane. The lorries will not get through due to parking and the way that residents already living in this area use the road. 3 - Junction 25 at Brighouse and Wakefield Road. I use this Junction every day during the week. I travel 64 miles to and from work everyday. 62 of those miles are done on the motorway network. The last or first two are in Brighouse. It should take me 8 minutes on average to get from Woodhouse to the Motorway and visa verse. It can take me 54 minutes to do the motorway miles. Then 25 to 45 minutes to get off at Junction 25 and do the last two miles home. How do you intend to deal with the already chocked infrastructure around Brighouse. We should be sorting this issue out instead of building new houses. The new Supermarket in Brighouse, has greatly

effected Wakefield Road and is causing additional delays. 4 - Traffic going to matches/concerts at the Stadium in Huddersfield. People use Brighouse as a rat run - this needs sorting out with Kirkless ensuing quick and easy access for all users. Brighouse is being used as a rat run, and the intention is to add another 2000 cars to this rat run! 5 - How is the School infrastructure going to cope with another 2000 pupils - it is simple maths - approx numbers of houses being built could bring in 2000 new pupils to the area. Woodhouse or the Rastrick Schools do not have the capacity to take these new pupils into the area. Plus the traffic associated with the School run! We have a very good quality life in Brighouse, and it is a very nice place to live, which I have done all my life, but the concerns listed should stop anyone seriously thinking about building new house in this area, you can see the detrimental effect on the community. All you have to do is go the local pool on a morning and listen to conversations, it all about traffic and how bad it is getting in Brighouse. Building more houses will tip balance. The town, the infrastructure, will not cope, and it will kill it!

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 **Lpp216**

Site ref (if applicable): **LP1451**

Person ID: **1182117**

Name: **Mr Stewart Brown**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The Proposed Local Development Plan is not sustainable for the following reasons: Calderdale is one of 23 Local Authorities that have not met their Air Quality Targets yet are proposing to build 4500 houses (of which Woodhouse comprises 1250) and an Employment Zone in an air quality management zone. No proposals have been put forward as to how this will be dealt with. The Prime Minister has strongly expressed her wish to retain Green Belt land and rules exist for its retention. Calderdale's Local Plan has disregarded all of these rules preferring to ignore the excess of brownfield sites within the authority's jurisdiction. No indication has been put forward in the Plan for waste water management. The Woodhouse site is on a slope and all water will drain towards the river, canal, and railway. Significant management proposals, which are currently absent from the Plan, are required to ensure that new flood risks are not introduced to an already sensitive area. Future traffic management in the local area has not been correctly predicted. The impact of 1250 dwellings will severely affect the surrounding road network to the detriment of the population's health and welfare.

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

Sound Reason:

The Local Plan is totally disproportionate to the housing development of the Calderdale Authority Area as a whole, with Brighouse and Rastrick receiving a proposed 4,500 new houses, including 1,250 in Woodhouse alone. No indication has been given as to how the infrastructure will be affected and funded. With the

proposed developments as above a massive impact will be felt in the town centre which is already gridlocked for most of the time. The road network cannot cope now, and frequently has to act as a relief valve for traffic diverted from the M62 when blockages occur in either direction. Further proposals for a new junction 24A will exacerbate this problem. A new junction will also affect the planned development proposed in the Local Plan. Site access has also been scantily considered with existing roads incapable of handling the volume of traffic expected from the proposed development. Many households nowadays have two cars and a proportion have three. Transport links to secondary schools will need to be considerably improved to convey pupils to existing schools in the area, however it is unlikely that the existing schools will be capable of accepting a large intake of additional pupils. Brighouse and Rastrick medical facilities are stretched to the limit now, it being a 3-week delay to book a doctor's appointment already. The additional residents from 4500 homes in Brighouse, Woodhouse and Rastrick will totally swamp existing services. What provision has the Local Plan made for those? 1642 empty houses exist across the Calderdale Borough against 1250 new dwellings being proposed for Woodhouse. This begs the question of whether this number of new houses are justified. Flood prevention measures have already had funding cut back whilst proposed extra pressure is being applied by the huge development in the Local Plan. Inadequate studies have been carried out into the ecological effects of the plan. No consideration has been given to existing wildlife habitats and routes, and the protection of bats and the at-risk greenfinches.

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

Duty to Co-operate Reason:

The neighbouring council Kirklees has already passed plans to build a huge housing development on the other side of the M62 from Calderdale's south east corner. Further commercial development is planned to take place in the valley upstream from Cooper Bridge (the South East corner of Calderdale's land). No discussion has taken place on the effects of these developments on traffic flows, air quality management, water management. Similarly no publicised discussions have taken place between the two authorities on the effects of the Calderdale Local Plan 2018.

Suggested Modifications:

Numerous reports, currently absent, should be put in place to deal with all the issues identified above.

Additional Evidence Link:

Comment ID **Lpp22**

Site ref (if applicable): **LP1451**

Person ID: **1179163**

Name: **Mr Terence Leach**

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:

We are very concerned about the proposed housing development in Woodhouse Lane and would like the following points to be taken very seriously: .The new housing development plan would not fit in with the

local environment. .The proposed plan does not fit in with the ethos of this area with an open aspect. .Appropriate infrastructure is not in place. Surely, a particular concern is regarding the need to co-ordinate the delivery of infrastructure and relevant facilities effectively - a)the highway in Huddersfield Road is already over-used and often there is a tailback with traffic from Brighouse town to Toot-hill Bank. This is already causing great frustration amongst motorists trying to get to work or schools. Indeed, traffic on all roads in the vicinity of Woodhouse Lane is already congested. b)nearby schools are bursting at the seams and doctors' surgeries are full. c) imagine additional cars from 1257 homes adding to the chaos which is already present. In 2016, consultants were appointed to explore the potential of accommodating new homes in S.E. Calderdale. The work concluded that 1223 new homes could be developed on this site """""" - now that figure has already increased to 1257. On what basis has a decision been made that this development will ensure that its size and location will support a sustainable community, when everything in this vicinity is already stretched to breaking point? Two extremely concerned residents in Woodhouse Lane.

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 **Lpp252**

Site ref (if applicable): **LP1451**

Person ID: **949518**

Name: **Mrs Pauline Whittle**

Organisation:

Agent ID:

Name:

Organisation:

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 representations in respect of the Local Plan, the subject of this Public Inquiry relate to the allocation of New Housing Sites. In order to meet projected housing requirements within the Plan Period, reliance is placed on the development of two "Garden Suburbs", (References LP1451 and LP1463) both located in the south of the Calderdale Area. The developments of these areas as proposed would result in a disproportionate provision of housing in the south of the Calderdale Area to the detriment of provision across the area as a whole. Further, the timescale of these "Garden Suburbs" would require substantial infrastructure provision in terms of education, health, transport and ancillary services, which would be undeliverable within the Plan Period, resulting in a significant housing shortfall in the Calderdale area as a whole. Such a scheme will not provide housing at a quick enough rate, due to slow sales rates apart from the huge infrastructure requirements, and therefore the Council will continue to have a lack of five year land supply, making the Local Plan not "sound". There is scant information or detail provided on how these Garden Suburbs would be implemented. There is no mention of other delivery partners being signed up to the Plan,(e.g.highway authorities, the Environment Agency, water companies) and no indication of a true timescale or when all the land, which I believe has multiple owners, would come forward. Circumstances

beyond the Council's control could mean very lengthy delays. During which time smaller sites could be successfully developed elsewhere within the Borough. The Council's Objectively Assessed Need (OAN) is too low. The Option now put forward (previously known as Option B) is inadequate as it fails to recognise Calderdale's significant and consistent undersupply of housing, and does not give convincing evidence regarding employment growth within the area, or weather conditions which could seriously affect building developments over the Plan period. As such the Local Plan is not sound. The Local Plan submitted to Calderdale Council by its Spatial Planning Team in 2017, which the Council rejected, provided a balanced approach to meeting the housing requirements of the whole of the Calderdale Area. This Plan was fully researched and evaluated, taking into account all relevant factors, and should be the Plan that is adopted. When examining the Plan for Tests of Soundness, I feel strongly that the current Plan has not been prepared or based on a strategy which seeks to meet objectively assessed development, and also that this version is not justified as the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence. The Spatial Planning Team's Draft Local Plan 2017 gave a balanced portfolio of sites to deliver the housing needs of the Borough, and enabled delivery by both small and large housebuilders, in a relatively short timescale. The Council's approach to providing new housing sites as expressed in the Local Plan now before this Inquiry, relies upon the development of two Garden Suburb areas to achieve projected housing demand within the Plan period and is likely to prove undeliverable. It is ill-conceived and illogical, and I urge that it be rejected.

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

Duty to Co-operate Reason:

Suggested Modifications:

Take out the Garden Suburbs from the Local Plan and revert to the 2017 Plan, as prepared by the Spatial Planning Team, which gave a balanced portfolio of sites to deliver the housing needs of Calderdale, enabling delivery by both small and large housebuilders. Small pockets of green belt identified by the Planning Team for development in that Plan could then be released and developers could create homes in small communities where people wish to live. In the case of Reference LP0683 (Land at Bank Top, Southowram, Halifax, HX3 9PB) this would result in a potential 60 properties, instead of 12. (please see comments attached to Reference LP0683).

Additional Evidence Link:

Comment ID **Lpp275**

Site ref (if applicable): **LP1451**

Person ID: **1181961**

Name: **Mrs Julie Bullen**

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?: **No**

Sound Reason:

I object to the Garden Suburbs - Policy SD7 and specifically the allocation of site LP1451 the Council has not clearly set out the exceptional circumstances that warrant the release of green belt for the Garden

suburbs. NPPF and the Council's own evidence base state alteration of Green Belt boundaries should be fully evidenced and justified, should be based only on exceptional circumstances and should ensure permanence of boundaries in the long term There is a disproportionate impact across the borough which is contrary to NPPF " greenbelt and the presumption in favour of sustainable development policy. The garden suburb sites were originally identified as urban extensions but have subsequently been rebadged as 'Garden Suburbs'. What was the reasoning behind changing this and how are they different now? Was this merely a way to try and secure government funding to support the garden community proposals. If it was, having looked at the criteria they fall very short of the requirements outlined in the prospectus and I would see no possibility of the government supporting them as proposed. There is no clear definition of what the council's intention is of these or how the sites fulfil the Government's expectations for a garden community. The recent Government Garden Community Prospectus (2018) states that where a garden community is proposed to take the form of transformational development to an existing settlement, it needs to be consistent with strategic plans for the area " (the LEP have not shown this as a housing growth area in the SEP) and should result in transformational outcomes for the settlement as a whole (economic, environmental and social) . Neither this or the qualities expected from such developments have been demonstrated and there will be significant disbenefits to the local neighbourhood and Brighthouse town The sites have been selected on the basis of proximity to transport routes alone " this is not adequate justification and it should be about much more than that. The Council have not provided evidence to show how the suburbs fulfil the requirements of NPPF 2018 para 103: 'The planning system should actively manage patterns of growth in support of [para 102] objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of travel modes.' No genuine travel plans are provided and as such the suburbs perform very poorly against this requirement. Woodhouse garden suburb (LP1451) is a nice, affluent location. There is evidence produced by CPRE and others that indicate that in such areas garden suburbs are likely to inflate prices further and not be affordable. Given the need for low densities and green credentials that are expected - how will these become nothing more than highly priced commuter estates? The Council need to explain how this meets the housing needs of the authority and delivery of affordable homes . Turley's Housing Technical Paper refers to Nathaniel Lichfield's 2016 report which indicates that large scale complex sites often requiring up front infrastructure costs are not always easy to kick start. Once up and running there is a need to be realistic about how quickly they can deliver new homes. The council is putting all their eggs in one basket and expecting that these sites " both in the same town will be able to deliver. As well as all the complexities of the sites, flooding one particular market with so many homes is NOT realistic and build rates are likely to be far less than outlined.

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

Duty to Co-operate Reason:

Suggested Modifications:

The garden suburb policy is fundamentally flawed, as is the spatial strategy and it should be reassessed as:- There are more sustainable ways of achieving housing delivery without large scale release of Green Belt land. There are other sites elsewhere such as :- sites around Halifax that better reflect settlement hierarchy and a better distribution of sites generally across the district sites that adjoin settlements (eg LPO951 off Stainland Road which has now been placed in Green Belt,) reintroducing some rejected sites higher densities on other sites proper assessment of brownfield land and windfall sites. The "garden suburb" concept does not provide sufficient justification for alteration of the Green Belt boundary in these instances, as better alternatives for housing delivery exist. The land proposed as garden suburbs should therefore be retained in Green Belt.

Additional Evidence Link:

Comment ID **Lpp276**

Site ref (if applicable): **LP1451**

Person ID: **1181961** Name: **Mrs Julie Bullen** 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?: **No**

Sound Reason:

I object to the allocation of LP1451 as this is not sustainable. The initial assessment of Woodhouse site - LP1451 confirms its is not a sustainable allocation, weakening the green belt and creating an urbanising effect. The Council admits in its own site assessment that the site does not score particularly well in accessibility terms but this seems to have been ignored on the basis this can be mitigated with on-site provision . Whilst Policy IM7 requires a master plan for the garden suburb to be developed with the community, including provision of appropriate infrastructure "" worryingly within the vision, which sets the framework for development of the site, there is no land proposed for facilities other than a primary school since the existing school is at capacity and some open space . I object to the vision as it is not accompanied by the necessary detailed level of evidence or technical study required to set the broad parameters for the required development that should be expected at this stage of the process to support a scheme of this size "" adequate means of access/ topographical/ecology/ health/ early years provision/drainage have not been demonstrated. This raises strong concerns about the sustainability of the site and how the scheme will create a sustainable community. If other facilities/ constraints are to be accommodated at a later date this will more than likely reduce the developable area and expected housing delivery numbers.

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

Duty to Co-operate Reason:

Suggested Modifications:

Site LP1451 should be removed as it is unsustainable

Additional Evidence Link:

Comment ID **Lpp277**

Site ref (if applicable): **LP1451**

Person ID: **1181961** Name: **Mrs Julie Bullen** 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?: **No**

Sound Reason:

I object to the site being termed as a 'garden-suburb', the site appears no more than a 'bolt-on' estate on the edge of Brighthouse without sufficient infrastructure to create a sustainable self-contained garden community. The economic or social benefits of the proposed development are not at all convincingly argued and there would be clear environmental harm. The government is clear that justification for garden community green belt release is not just about housing but the additional benefits that this will bring. In this case it appears the uses are generated by the development rather than vice versa ie new primary school. Affordable housing is only proposed at the level expected for this particular market area "" so no additional benefit in this respect either. This is a nice, affluent area where a garden suburb is likely to inflate prices and not be affordable contrary to the Council's priority outlined in SO4. Policy IM7 refers to infrastructure but this is not included in the vision! TCPA 's assessment of garden communities indicates that this type of 'bolt on' development can in fact encourage increased car use creating no more than a dormitory suburb without economic or community infrastructure built in. The likelihood is that car use will continue to dominate in this location. Walking distances specified in the vision are under represented 15m to railways station and 20 to town centre presumably because the distance has been measured as the crow flies (1.5km to the town centre) In reality it takes this to get from outside the site if you are an able, quick walker and the up hill journey back is much slower! The council need to clearly set out why this location and what local level exceptional circumstances exist to justify how the benefits exceed the harm to green belt.

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

Duty to Co-operate Reason:

Suggested Modifications:

If this is a 'garden' suburb as we are led to believe, the council should sign up to garden city principles to deliver and incorporate these standards into the master planning policy IM7 to ensure sustainable outcomes are achieved.

Additional Evidence Link:

Comment ID **Lpp278**

Site ref (if applicable): **LP1451**

Person ID: **1181961**

Name: **Mrs Julie Bullen**

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?: **No**

Sound Reason:

I object to the allocation of site LP1451 on green belt grounds and the fact exceptional circumstances for release have not been demonstrated and harm would outweigh the benefits. The evidence provided to release green belt land at Woodhouse LP1451 for a garden suburb is not robust, credible or justified. There

will be benefits in terms of affordable housing provision (but this follows the standard policy expected within this locality and does not provide additional benefit) and contribution of homes to meet housing needs. Whilst open space will be provided within the site this is at the expense of the access to open countryside that is currently available and heritage and ecological assets. These benefits do not exceed the harm to green belt, heritage and ecology of the site and negative impact on the surrounding existing community and infrastructure. The Council identifies Woodhouse garden suburb "" LP1451 as most sensitive green belt in their evidence "" performing 4 of the 5 reasons for inclusion. The green belt site survey form specifies categorically the site WOULD potentially lead to ribbon development with a high potential for unrestricted sprawl lead to the coalescence of towns. not safeguard the countryside from encroachment harm some heritage assets Contrary to this in their 'duty to co-operate' statement, the council then specify that the reduced gap is acceptable and would not lead to coalescence! It is clear this site is located within an area of green belt that performs the key strategic role of preventing the further merger of Kirklees with Calderdale. Green belt land to the south (within Kirklees boundary) was recently accepted for release for an urban extension by the Kirklees local plan inspector in July 2018 which already lessens the gap significantly and makes it even more important to retain and protect the role of the remaining green belt land in a meaningful manner. The removal of this site would further reduce the open gap between Kirklees and Calderdale contributing to the merger of the two settlements "" especially along the Huddersfield Road frontage where the proposed M62 Junc 24a (currently identified as critical in both the Kirklees and Calderdale's plans for the delivery of the raft of large housing sites within the area "" although worryingly NOT in Highways England plans yet and no detailed design) is planned to go. This would result in continuous urban built form along this main road corridor. The remaining area proposed would largely only leave Bradley Wood in isolation. The majority of Bradley Wood is not open for general access as it is home to the West Yorkshire County Scout Camp and Activity Centre. In the spirit of the green belt, this limited access would not represent 'accessible open countryside' . The proposal would undermine the purpose of including land in the greenbelt by:- preventing meaningful access to the open countryside for those living in the surrounding urban area removing opportunities for access to the open countryside for the urban population; removing opportunities for outdoor sport and outdoor recreation near urban areas; removing an attractive landscape near to where people live removing land in agricultural and related uses Furthermore figs 27 and 28 of the infrastructure delivery plan do not categorically show good accessibility to natural and semi natural land within the existing residential or proposed site area (although the map is not easy to see at the scale provided). The green belt currently provides this opportunity but would be eroded by the proposal. Whilst the garden suburb will integrate areas of open space the council needs to evidence how this will be more positive than the open access and opportunities that the site currently offers for leisure/recreation. The garden suburb would encroach on the openness and permanence of the green belt removing open land which would harm the landscape character of the area which critically forms the setting of the ancient Bradley Wood and listed heritage assets at Firth House Farm (which lie within a central position within the proposed site). here will be significant harm on the landscape character, heritage assets and ecology. Landscape character The landscape character of the site (rural fringe) is of significant merit and quality as indicted in the evidence, visible from a distance when viewed from the surroundings. With narrow rural lanes and footpaths, hedgerows, infield trees and Firth House Farm hamlet it is indicated as having a strong rural character "" the historic field structure remains intact and the land continues to be used as effective farm land. The Council state that this will not be affected in the RAG "" how can this be true when this will be removed if the site is developed. Heritage Assets Heritage England note that the group of listed buildings at Firth House lie within an open rural landscape, likely to have remained relatively unchanged, and therefore greatly contributing to their historic setting and enhancing the buildings' significance. A Heritage Impact Assessment has now been carried out following these comments (April 2018) although this is not reflected in the submitted vision and it is clear that there will be major harm to the settings of three listed buildings and other heritage assets without significant changes to the vision including restrictions/reductions on the proposed development. There are significant areas where no development should take place at all and areas where

development should be restricted. Notably the trees, hedgerow and stone walls along Firth House Lane should be retained and enhanced. The council has NOT reflected this in the developable area at Appendix 1 site allocations (developable area). As a single track this means it does not provide a suitable access into the site in its current form as proposed in the vision. Even if it did, it is constrained by development at the entrance onto Woodhouse Lane. This restriction critically means the main arterial route proposed through the length of the site to serve development would not be acceptable either as it would have to puncture the lane resulting in significant harm to this heritage asset. Therefore the site allocation is contrary to NPPF as the vision for the site would cause harm to the significance and setting of the buildings at Firth House Farm as heritage assets and it can be concluded that the masterplan vision for the site is NOT deliverable or sound. Ecology and Priority BAP habitats The Ecology report indicates that the site contains two types of UK BAP Priority Habitats i.e. Deciduous Woodland and Traditional Orchard and ancient woodland bounds the southern boundary. There is inadequate assessment of the impact on this to inform the vision or site development. The habitats are spread consistently across the entire site and are not restricted to discreet pockets within the site or at the site margins. Buffers will be required around woodland within the site and not just around the boundary and Priority Habitat is in danger of being destroyed by development. There is NO Protected Species Report and this should be required before the site is allocated so a full understanding can be reached of the impact of development on any species present. Without this it may mean that the site cannot actually be developed or the anticipated quantum of development is undeliverable. This is a haven for wildlife which is a fantastic asset for the community who live in the area, walkers and visitors to Bradley Woods. This includes buzzards, kestrel, hedge sparrow, squirrels, lapwing, birds of prey, swallow, Canada geese, bats, deer, pheasants, owls, hares, rabbits, amphibians, insects such as bees, badgers, hawks. Bradley Wood is ancient woodland and development will also impact on this. We often have the pleasure of seeing deer and foxes in the fields adjacent to Ryecroft Lane and bats are evident around our property on an evening. It is unacceptable to allocate the site or developable areas without proper assessment of the impact on ecology/protected species. The council should be required to undertake a Protected Species Report to check the impact on the wildlife and ancient woodland before any allocation is made. Other technical documents Additionally, the masterplan strategic vision also fails to provide sufficient technical information needed to determine the impact on the scale and form of this development and this puts into question the developable area, capacity of the site and how it meets 'garden city' principles that should be required at this stage :- Motorway noise "" what is the impact/buffers need to be defined? land contamination? non mains drainage? impact on Brighthouse AQMA and the impact on air quality and designation as an AQMA at Toothill which is currently being monitored for traffic pollution. Requirements for health service provision and early years provision I therefore object as there is no clear framework to justify the development as proposed (Policy SD7) for site LP1451.

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

Duty to Co-operate Reason:

Suggested Modifications:

Site LP1451 should be removed and retained as green belt since exceptional circumstances have not been demonstrated and the harm to heritage, ecology would outweigh its release.

Additional Evidence Link:

Comment ID **Lpp279**

Site ref (if applicable): **LP1451**

Person ID: **1181961**

Name: **Mrs Julie Bullen**

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?: **No**

Sound Reason:

I object to the phasing of development shown in the plan for LP1451 as medium term as this is unrealistic:- It is encouraging to see the need to undertake a full master planning process (policy IM7) to inform any planning application and secure planning approval - but this is not something that happens overnight. Evidence from other garden suburb proposals around the country and TCPA research indicates that it can take up to 10 years or more from adoption of a plan to achieve this "" detailed master planning cannot start until the plan is adopted in 2020 and this could mean development may not actually start until around 2030 in reality. Deliverability of the strategy is therefore questionable within timeframe outlined. The council has based delivery on Lichfield's research. They have allowed a build out rate of 140/year, 1 year for master planning and 4 years to achieve outline planning of the whole site. However, the research indicates that for sites of up to 1499 in size an average build out rate of 122 can be expected. It also indicates 6.6 years on average for planning approval ""that is without factoring in any detailed masterplanning. Therefore I object to the start date and delivery timescales within the plan as these are heavily inflated and unrealistic as currently proposed and need to be reviewed for accuracy. Government guidance (prospectus) on the delivery of garden communities indicates it is necessary to ensure that development does not have an unacceptable detrimental impact on existing local residents and the surrounding area by securing the necessary infrastructure, services and community facilities at the appropriate stage in the development process. This has not been demonstrated and the Council need to demonstrate clearly how the vision can be delivered without significant impact on the Woodhouse community?

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

Duty to Co-operate Reason:

Suggested Modifications:

The phasing of Site LP1451 should be revised to reflect a more realistic delivery timeframe

Additional Evidence Link:

Comment ID **Lpp282**

Site ref (if applicable): **LP1451**

Person ID: **1181961**

Name: **Mrs Julie Bullen**

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?: **No**

Sound Reason:

South East Strategy and Site LP1451 - highways I object to the Council's SE Strategic Vision in relation to LP1451 as it is inadequate and does not provide sufficient highway technical evidence to support a satisfactory framework for development of the Woodhouse garden suburb site at this stage, making the allocation unsound. Confirmation of how access will be gained is sketchy, confusing and not conclusive.

New M62 J24a The SE Strategic Vision highlights the strategic importance of the J24a scheme and indicates the main access into the Woodhouse site from the A641 will not be implemented until there is greater certainty about the future of M62 J24a. This junction scheme is currently NOT even identified in Highways England plans. Kirklees' Local Plan evidence specifically indicates that the J24a junction provides key transport mitigation to assist delivery of their sites around the Bradley/Fixby area and adjoining authority development growth. Calderdale's also indicates that delivery of a new motorway junction would 'affect the distribution of traffic across the local road network, and would potentially influence the scope and location of measures that are required as part of the A641 scheme'. In the main LP1451 site assessment report, Calderdale highways Development Management indicate the LP1451 development would have a severe impact on the proposed junction. Highways England say the site should consequently only be a long term allocation - why does the council show it as medium? It is clear therefore that if the junction does not go ahead or is delayed there will be an impact on the existing road infrastructure and potential design and layout of the proposed garden suburb. The site vision is inadequate without a clear design for this junction and knowledge of the impact it will have on the development. Local residential highway network Access is proposed through the existing residential area for early development but evidence has not been provided to properly verify suitability or delivery. This is unsuitable. Concerns about this are confirmed in the Technical Statement 8 -Traffic assessment 2016 that supports the preparation of the SE vision:- Currently vehicular access is through the existing Woodhouse neighbourhood. This presents challenges to the development of the site and is likely to restrict the number of units which can be delivered on the site. Any access to the site, such as Firth House Lane and Shepherds Thorn Lane, are too narrow at present to accommodate significant vehicle flows. Widening these accesses and improving links south of Ryecroft Lane and Woodhouse Gardens will go some way to addressing this issue. Due to the restrictions off Woodhouse Lane, it is likely that a new access road will have to be provided, possibly onto Huddersfield Road (A641) to the south of Gatehouse Lodge. Any junction close to the bridge over the M62 on the A641 would have to consider any plans to construct a new motorway junction at 24a. There will also need to be improvements to junctions along A641 such as Daisy Road and Armitage Avenue and/or Birds Royd Lane to accommodate traffic from the development. How does this confirm that there is suitable access for early development of 330 units? There is mention of links from Woodhouse Gardens that are required? "" the land adjacent to Woodhouse Gardens has been removed from the allocation following ecology / wildlife concerns. There is NO link from this point at all. But again it is not fully clear what is proposed. Access points Three access points are indicated on the vision plan but it is not evidenced how these are achievable. The main one is from the A641 Huddersfield Road and then two from the existing Woodhouse residential area from Firth House Lane and Ryecroft Lane. A material consideration is the HIA that has now been carried out (following Heritage England's request) which calls for the retention of Firth House Lane and its hedge/tree and walls in its current form since this forms the setting of the listed Firth House farm. This means the single track Firth House Lane is now confirmed as being unsuitable to provide access to residential development . Furthermore the access from the A641 as proposed crosses this and would therefore impact on the heritage value of the site. The A641 should therefore be dismissed as unsuitable for the reasons previously given "" prematurity as well as the effect on the heritage value of Firth House farm and its setting. This access also has potential to impact on the Gatehouse at the top of Woodhouse Lane which requires a buffer to provide protection to its boundary (see Heritage Impact Assessment) and ecology. Two potential access points have been defined on the vision map from which to gain access for early development but these are unsuitable to accept either the level of development proposed or the associated construction traffic that will be generated for an early 330 homes. They are located within a residential area which already suffers from high levels of on street parking (referred to in the vision) which

limits access to single passing points throughout the area at all times. The area is a 20mph zone and Woodhouse Primary School located off Daisy Road also results in significant traffic movements at school start and finish times and beyond. This extends down to the Daisy Road park and the junction with Woodhouse Lane. Woodhouse Lane is also used as a rat run to avoid queuing traffic on the main A641 into Brighouse. Firth House Lane is unsuitable as it cannot be improved from a single track without impacting on the heritage value of the site. This access point should be discounted on heritage grounds. In terms of Ryecroft Lane, this access is a local residential lane and is also unsuitable for construction or significant levels of traffic/development. The 330 homes proposed for early development would result in an expected 528 cars at an average of 1.6/property which is conservative figure. The lane is accessed from a blind bend on Woodhouse Lane. On street parking occurs from the blind bend (from 6 to 20 Woodhouse Lane) to Daisy Road park at all times creating a single road where cars regularly have to reverse as they come round the corner due to severe, poor visibility. Access to the rear of 6-20 Woodhouse Lane and maintenance to the park is directly opposite the lane access. Access up Ryecroft Lane is also restricted by onstreet parking/ single pass points, as well as cars reversing into the road to exit from a number of driveways which makes it unsafe for construction traffic or the scale of development proposed. Site LP1000 is also allocated within the plan for 24 homes off Stratton Road/ Woodhouse Lane. This requires a new access point to be created in close proximity to the Ryecroft bend. This is programmed to start prior to the start of the garden suburb. It would create a further junction onto Woodhouse Lane a few meters from Ryecroft Lane adding to safety, access and capacity issues that already exist in this location. It should also be highlighted that accessing the site from Birds Royd Lane would not be acceptable for construction traffic due to the weight restriction on the railway bridge limiting vehicles to 7.5 t. as well as tightening of road widths and a narrow single footpath up the hill to Ryecroft Lane. The delivery of the proposed access points is not achievable or sound. Early development from Firth House Lane/Ryecroft Lane would not be achievable. The only way would be to provide the main access from the A641 " " but as outlined this would appear premature! It would also cut through Firth House lane - impacting on the setting of the heritage assets in the site. Even if there were exceptional circumstances to warrant green belt release (which I strongly disagree with) , if access cannot be satisfactorily provided or planned, the Inspector is urged to consider whether development of the Woodhouse garden suburb is indeed valid or premature for this plan review pending confirmation of the implementation, design and impact of the M62 24a strategic highway junction improvement scheme.

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

Duty to Co-operate Reason:

Suggested Modifications:

Policy SD7 " " the allocation of Woodhouse Site LP1451 is unsound and it should be removed as a garden suburb housing site and retained as green belt for the following reasons:- The designation is premature pending details of the strategic M62 24a junction proposal. It is contrary to NPPF para 133 and 134 in that it would not represent sustainable development and exceptional circumstances to remove the site from green belt have not been demonstrated or justified. The proposed vision is not deliverable " " access is not suitable, development as envisaged would impact on heritage and ecology assets and have a detrimental impact on the surrounding residential area. There are no clear benefits that outweigh this harm. The existing green belt boundary forms a clear, defensible boundary following the extent of development down Woodhouse Lane and Ryecroft Lane (where the historic settlement of Upper Woodhouse remains with a row of former farm worker cottages and converted barns). This remains the most appropriate line for the extent of development. Appendix 1 should be amended to correctly show all areas where development is to be restricted on the site as a result of current Heritage Impact Assessment. The 20m buffer from Bradley ancient woodland also needs to be reflected as do ecological protections. This needs to be updated with further critical technical studies that have not yet been provided. In the event the

inspector is minded to accept the suburb proposal, a detailed masterplan for the whole site should be in place for the whole site in accordance with IM7 and worked up with the community. However, the early phasing of development from Firth House Lane and Rycroft Lane should be removed until a route from the A641 can be provided to service the site to protect the existing residential area since the road network and access points are unsuitable to accommodate the construction vehicles and the level of development. Housing numbers should be reviewed and reduced to protect heritage and ecology assets

Additional Evidence Link:

Comment ID **Lpp346**

Site ref (if applicable): **LP1451**

Person ID: **1174900**

Name: **Mr Ian Bull**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I cannot see any evidence of a bat survey being carried out.

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

Sound Reason:

Bats and hedgerows This green belt area is home and feeding habitat for a large population of bats. I cannot see any reference to a bat survey being carried out. They are legally protected animals and their feeding grounds which include the hedgerows are also protected. The bats thrive in this area because it is dark, quiet and provides adequate food. The planned development would destroy this habitat, bring light pollution, remove the feeding grounds and therefore, it would kill off the bats. A road is planned down what is historically called Rycroft Lane, which is actually a narrow single footpath which you cannot get any vehicle other than a motorbike down. It is lined by hedgerows which are protected and is a feeding area for bats. There is a centuries old oak tree within this hedgerow and the bottom bow of this tree is less than 2 metres above ground level. A van, delivery wagon, ambulance, fire engine or bin lorry would not possibly fit through it. The approach to this is also a single track lane which again is lined with protected hedgerows so there is no possibility of widening it. Traffic and pollution The existing narrow, single track lane which runs to the farm is also lined with protected hedgerows. Approximately a dozen vehicles currently use the lane; a development of 1253 houses surrounding this lane would be chaotic and completely unworkable. This lane exits into Woodhouse Lane which is the main road through Woodhouse. Woodhouse can only be accessed via 4 roads which all connect to the A641, Huddersfield Road. Therefore, all traffic in and out of the area travels on 1 road. There are only 2 bridges in Brighouse and most traffic heading North or South use the A641. The recent traffic survey was done during a very quiet period when the schools were quiet due to exams or closed for holidays, so the survey is inaccurate. The traffic during rush hour and at the weekend, is regularly chock-a-block from top to bottom with queuing traffic heading down the hill, whilst cars travelling up the hill are racing as it is long, straight and the speed limits increase the further up you go. Therefore, pollution in the area is appalling and dangerous as it is. A development of a further 1253 houses with an average of 1.5 cars per household would put an extra 1900 cars into the immediate area! The average car is 4.4 metres long X 1900 = 5.2 miles when lined up bumper to bumper. How are the A641 and roads within Woodhouse to cope? They Won't! A recent survey in The Times revealed that heavily excessive traffic causes detrimental damage to lungs and a 40% increase in the risk of developing dementia. The planned development is exceptionally dangerous to all living in the area.

Woodhouseroads are all narrow boulevards and the increased traffic would be unsafe for local children. I fear this plan has a blatant disregard for health and safety. Destruction of a delicate ecosystem It is inappropriate to permanently destroy a beautiful delicate ecosystem and then sell it as a ' Garden Suburb '

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

Site ref (if applicable): **LP1451**

Person ID: **1181240**

Name: **Justine Harrison**

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 to the plans of building over 1 thousand homes in such a highly built up area already. The roads are already gridlocked, schools over subscribed and not forgetting to mention the doctors surgeries that are at breaking point. No extra services are being put in place to accommodate all these extra people. If you visit Lindley you only need to see the damage that has caused to the area, flooding horrendous traffic, schools that are full and certainly no extra doctors. This is a lovely area that still needs green areas.

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

Site ref (if applicable): **LP1451**

Person ID: **1181284**

Name: **Mr & Mrs Smith**

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:

Regarding the Proposal to build over 1000 houses in the Woodhouse area, in our opinion the extra traffic which this will generate will not be sustainable. Already if there is an accident on the Motorway the traffic goes down either Bradley Road or Huddersfield Road. There are long tailbacks with standing traffic and Brighouse becomes a bottle neck. The occupants of the new houses could have between 1-4 cars at each house and so where does all this extra traffic go? Have any of the Councillors who are pushing for this area for new houses monitored Huddersfield Road at BUSY times? Several years ago it was mentioned about a school being built off Shepherds Thorn Lane. This was dropped as it was said that it would generate too much traffic. At this time there wasn't the amount of traffic on the roads as there is now! Where is it expected that the children will go to school in the area when the schools are already at capacity with pupils? Term is at present a time when local roads are clogged up with cars with children being taken to school as many don't live in the area. How about the Doctors who also have enough patients? Why has Brighouse been targeted for all these extra houses when there are other areas in Calderdale which are quite spacious?

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 **Lpp409**

Site ref (if applicable): **LP1451**

Person ID: **1182980**

Name: **Mr Trudy Wallace**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

object to the plan because it is not legally compliant because:-
i. Enterprise Zone for Clifton has not received a meaningful consultation
ii. previous studies under regulation 18 have not been accounted for in this proposal
iii. Any rates received in this park will go to Leeds Council and not to pay for the air quality requirements or local infrastructure.
iv. 1.5 million sqm of unoccupied warehouse space is available in Calderdale this has not been considered
v. Air quality - the council is in breach of its air quality requirements:-
vi. Calderdale is one of 23 councils which has not met its air quality targets
vii. Wakefield Road is currently well above these, no plans are in place to improve this and the plan does not consider the additional traffic and the pollution of extra vehicles from Clifton Enterprise Zone or housing sites. No current air quality targets are been met.
viii. No assessment has been made on the increased numbers of vehicles against these targets and the impact of the health of residents.
ix. Insufficient consultation with Kirklees and Bradford on the cumulative impact on air quality of all allocations in Calderdale and their plans.

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

Sound Reason:

I object to the plan (Section 6) as the spatial strategy and allocation of garden suburbs (SD7) specifically Woodhouse site LP 1451 is flawed and unsound:- Disproportionate number of houses are focused on the South East of the borough i, Plan is for 9500 houses in Calderdale, 4500 planned for Brighouse i, Brighouse has currently only 3.9% of Calderdale area, but it will take over 50% of the planned houses, i, Brighouse will be over developed " i, Development is not spread equally across the area. i, Halifax is the largest town and should take the most development and others should take a proportionate amount ie in the central and upper valleys Infrastructure is not suitable for number of houses planned for the following reasons i, Road congestion "" traffic in Brighouse is often a bottleneck at rush hours and any time the motorway is closed. No suitable infrastructure for current traffic without the potential addition of 4500 cars in Brighouse and the additional houses in neighbouring councils of Kirklees and Bradford, i, Schools "" local schools are all full to capacity with waiting lists "" no provision in plan for any new schools i, Health centres "" no provision for new centres to provide for 4500 houses with a potential of 4 per house "" this does not include any additional provision needed at local hospitals and impact on NHS waiting lists. i, No detail or commitment to a new motorway junction M62 J24a. The junction would impact on the main access to the Woodhouse garden suburb LP1451 and employment site LP1618 "" how can these sites go ahead when these details are unknown? i, I have heard there are also plans for a relief road which would run through the proposed garden suburb at Woodhouse. This needs to be investigated "" what is this and how can it be developed? i, Woodhouse garden suburb and planned motorway junction and the potential relief road all run aside Ancient Woodland at Bradley woods "" no apparent independent study has been made of the impact of this woodland i, No apparent study has been made to look at the safety of the many thousands of children who use Bradley Wood scout camp "

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

Duty to Co-operate Reason:

I object to the plan as the Council have not met their duty to co- operate:- i, Cross boundary consideration has not taken place to understand the cumulative impact of all development sites i, 1800 houses in Kirklees will back onto the 2400 houses planned in Woodhouse i, 1200 Houses planned to back onto Rastrick i, There is no commitment in the plan to co operate i, Clifton Business Park to be owned by Leeds council has not considered existing bottleneck at Cooper Bridge and the planned houses there. i, There is no cooperation with Kirklees and Braford on the setting on a CIL

Suggested Modifications:

Additional Evidence Link:

Comment ID **Lpp410**

Site ref (if applicable): **lp1451**

Person ID: **1182983**

Name: **Mrs Trudy Wallace**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I object to the plan because it is not legally compliant because:- Enterprise Zone for Clifton has not

received a meaningful consultation "" previous studies under regulation 18 have not been accounted for in this proposal "" Any rates received in this park will go to Leeds Council and not to pay for the air quality requirements or local infrastructure. 5 million sqm of unoccupied warehouse space is available in Calderdale this has not been considered Air quality "" the council is in breach of its air quality requirements:- Calderdale is one of 23 councils which has not met its air quality targets Wakefield Road is currently well above these, no plans are in place to improve this and the plan does not consider the additional traffic and the pollution of extra vehicles from Clifton Enterprise Zone or housing sites. No current air quality targets are been met. No assessment has been made on the increased numbers of vehicles against these targets and the impact of the health of residents. Insufficient consultation with Kirklees and Bradford on the cumulative impact on air quality of all allocations in Calderdale and their plans.

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

Sound Reason:

I object to the plan (Section 6) as the spatial strategy and allocation of garden suburbs (SD7) specifically Woodhouse site LP 1451 is flawed and unsound:- Disproportionate number of houses are focused on the South East of the borough Plan is for 9500 houses in Calderdale, 4500 planned for Brighouse Brighouse has currently only 3.9% of Calderdale area, but it will take over 50% of the planned houses, Brighouse will be over developed Development is not spread equally across the area. Halifax is the largest town and should take the most development and others should take a proportionate amount ie in the central and upper valleys Infrastructure is not suitable for number of houses planned for the following reasons Road congestion "" traffic in Brighouse is often a bottleneck at rush hours and any time the motorway is closed. No suitable infrastructure for current traffic without the potential addition of 4500 cars in Brighouse and the additional houses in neighbouring councils of Kirklees and Bradford, Schools "" local schools are all full to capacity with waiting lists "" no provision in plan for any new schools Health centres "" no provision for new centres to provide for 4500 houses with a potential of 4 per house "" this does not include any additional provision needed at local hospitals and impact on NHS waiting lists. No detail or commitment to a new motorway junction M62 J24a. The junction would impact on the main access to the Woodhouse garden suburb LP1451 and employment site LP1618 "" how can these sites go ahead when these details are unknown? I have heard there are also plans for a relief road which would run through the proposed garden suburb at Woodhouse. This needs to be investigated "" what is this and how can it be developed? Woodhouse garden suburb and planned motorway junction and the potential relief road all run aside Ancient Woodland at Bradley woods "" no apparent independent study has been made of the impact of this woodland No apparent study has been made to look at the safety of the many thousands of children who use Bradley Wood scout camp "" how will plans affect the operation of the camp "" a holistic approach has not been taken Provision for care homes, mental health services and special needs care has not been considered Cumulative impact of all housing sites within the area has not been taken into account I object to the allocation of the Woodhouse garden Suburb LP1451 as this is unsound Required technical studies have not been carried out to assess the impact of such a large development eg Ecology, wildlife, flood plains, green belt and residents. Garden suburbs should provide lots of open space and natural areas but the current plan for Woodhouse does not do this and access to open countryside provided by the current green belt will be lost. Motorway noise is also not considered with proposed removal of the greenbelt which acts as a barrier.

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

Duty to Co-operate Reason:

I object to the plan as the Council have not met their duty to co-operate:- Cross boundary consideration has not taken place to understand the cumulative impact of all development sites 1800 houses in Kirklees

will back onto the 2400 houses planned in Woodhouse 1200 Houses planned to back onto Rastrick There is no commitment in the plan to co operate Clifton Business Park to be owned by Leeds council has not considered existing bottleneck at Cooper Bridge and the planned houses there. There is no cooperation with Kirklees and Braford on the setting on a CIL I object to the Community Infrastructure Levy (CIL) policy because:- Community Infrastructure Levy (CIL) has been set at around £40 per sqm, this is far less than any other local areas (Hebden Bridge at £85). This would give approx. £24million, but this would not cover the new roads, schools, utilities, superfast broadband, open spaces, relief motorway junction, health centres, hospital extension etc . Why is this amount so low for Brighouse and why has the cooperation with Kirklees on the same amount now been sought. This is an obvious incentive for developers and adequate provision has not been made

Suggested Modifications:

Additional Evidence Link:

Comment ID **Lpp416**

Site ref (if applicable): **LP1451**

Person ID: **1183022**

Name: **Mrs Laura 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:

The LPA have not considered the impacts closely enough to accommodate the proposed development; Highways & Infrastructure All of the artery routes serving the town centre are already heavily congested, how will the existing highways network cope with the volume of traffic? What improvements are proposed to ease congestion? The creation of a new motorway junction will increase the volume of traffic around Huddersfield Road which will be travelling at a high speed. This will impact safety, noise and congestion for residents. Junctions in close proximity and on a steep incline on the motorway will cause bottlenecking and further congestion on the M62. This is likely to increase accidents on the motorway which have a serious knock on effect on levels of traffic in the local area. Huddersfield Road is already problematic to join from Woodhouse Lane/ Armitage Avenue/ Daisy Road due to the heavy volumes of traffic and speed at which they travel, further vehicles will only add to the misery and tailbacks down Woodhouse Lane and surrounding streets. There are no roads proposed which would be suitable as access roads to accommodate the increase in traffic. Woodhouse Lane is already used as a rat run to avoid the large queues on Huddersfield Road. The implementation of the 20mph zone is ineffective unless enforced. Traffic continues to travel at speeds much greater than this despite the signs. Woodhouse is an area with a large number of young families and pets. With the amount of on street parking crossing the road is problematic at the best of times. Further vehicles on the road will only increase the danger people face when walking in the area. Pollution Calderdale is already one of 23 areas in the country which has not met its air quality targets. Due to the proximity of the M62, Brighouse has more than its share of traffic compared to other more rural parts of Calderdale. An increase in vehicles due to the housing proposal will only be of detriment to those already living in the area. What proposals are in place to protect the people already living here and the adverse health impacts or increased pollution? Flooding Brighouse has suffered

historically from severe flooding. Building on green spaces in the vicinity will impact the potential for further flooding due to soakaway and surface runoff. Fields in LP1451 protect the town centre and industrial estates at present. Ecology The open spaces between Woodhouse and Bradley Woods are home to a variety of wildlife including but not limited to deer, bats, pheasant, birds, flora and fauna. The trees help to protect properties on Woodhouse Lane from the noise of the M62 and reduce pollution. Open space This development will result in a loss of open space and areas for walking for residents and a loss of agricultural land. Green space is valuable and provides a haven for residents to spend their free time. Business and economy It has been widely analysed in the media that traffic congestion costs UK economy £4.3 billion a year. The levels experienced in Brighouse can therefore only have a negative effect on the economy of the local area and deter people from visiting. A further 4,500 houses planned for Brighouse could result in up to an extra 9,000 cars living within the town and travelling on the roads adding to congestion. Environmental health There will be a significant increase in air and noise pollution not only during the construction phase but as a result of the new properties and additional traffic. There will be a loss of visual amenity for the properties who live on Woodhouse Lane, many of whom paid a premium for their houses due to the open space to the rear. Green Belt According to the National Planning Policy Framework (NPPF) paragraphs 79 to 92 the fundamental aim of the Green Belt is to prevent urban sprawl. The Green Belt serves 5 purposes; 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 to preserve the setting and special character of historic towns to assist in urban regeneration, by encouraging the recycling of derelict and other urban land The proposals outlined in the Local Plan directly challenge each of the above purposes. The areas of Calderdale and Kirklees will become one, only separated by the eye sore of the M62. There will no longer be any distinction between the two, Brighouse and Bradley will have no green areas to separate them. There are many brownfield sites available throughout Calderdale and it is questioned why they are not being utilised instead of the Green Belt? The Green Belt should only ever be used as a final resort and only in a scale which is suitable to the local area, not merely due to the convenience of having a large area and the economies of scale to build on it. The NPPF also states that; 'once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land'. Once again these proposals have not been taken into consideration by Calderdale Council as the plan will not enhance the landscape, visual amenity and biodiversity. Nor will it improve the land which is there at present. There are no opportunities proposed to provide access to sports or recreation for the additional number of people who would be living in the area. England has 14 Green Belts in total, covering 13% of the land. It is for this reason that they should be protected and not exploited. There do not appear to be any 'very special circumstances' as required for Green Belt development to this application. The only benefit it would appear is the financial benefit to Calderdale Council despite their clear disregard for local residents. The development is wholly inappropriate by virtue of its size and appearance and should therefore not be allowed. Calderdale has a number of brownfield sites available which are not been proposed for development even though they would be more suitable. Community Infrastructure Levy (CIL) Why has the CIL been set at £85/sqm for Hebden Bridge and only £40/sqm for this site? Surely using differential rates is encouraging development in one area over another? Brighouse will be suffering from a complete over development and will not be financially benefiting at the same rate as Hebden Bridge would with a higher CIL.

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

Duty to Co-operate Reason:

Suggested Modifications:

Assess brownfield sites rather than simply looking at Green Belt. Make development more proportionate throughout Calderdale.

Additional Evidence Link:

Comment ID **Lpp417**

Site ref (if applicable): **LP1451**

Person ID: **1183041**

Name: **Mr Laura 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:

The LPA have not considered the impacts closely enough to accommodate the proposed development; Highways & Infrastructure All of the artery routes serving the town centre are already heavily congested, how will the existing highways network cope with the volume of traffic? What improvements are proposed to ease congestion? The creation of a new motorway junction will increase the volume of traffic around Huddersfield Road which will be travelling at a high speed. This will impact safety, noise and congestion for residents. Junctions in close proximity and on a steep incline on the motorway will cause bottlenecks and further congestion on the M62. This is likely to increase accidents on the motorway which have a serious knock on effect on levels of traffic in the local area. Huddersfield Road is already problematic to join from Woodhouse Lane/ Armitage Avenue/ Daisy Road due to the heavy volumes of traffic and speed at which they travel, further vehicles will only add to the misery and tailbacks down Woodhouse Lane and surrounding streets. There are no roads proposed which would be suitable as access roads to accommodate the increase in traffic. Woodhouse Lane is already used as a rat run to avoid the large queues on Huddersfield Road. The implementation of the 20mph zone is ineffective unless enforced. Traffic continues to travel at speeds much greater than this despite the signs. Woodhouse is an area with a large number of young families and pets. With the amount of on street parking crossing the road is problematic at the best of times. Further vehicles on the road will only increase the danger people face when walking in the area. Pollution Calderdale is already one of 23 areas in the country which has not met its air quality targets. Due to the proximity of the M62, Brighouse has more than its share of traffic compared to other more rural parts of Calderdale. An increase in vehicles due to the housing proposal will only be of detriment to those already living in the area. What proposals are in place to protect the people already living here and the adverse health impacts or increased pollution? Flooding Brighouse has suffered historically from severe flooding. Building on green spaces in the vicinity will impact the potential for further flooding due to soakaway and surface runoff. Fields in LP1451 protect the town centre and industrial estates at present. Ecology The open spaces between Woodhouse and Bradley Woods are home to a variety of wildlife including but not limited to deer, bats, pheasant, birds, flora and fauna. The trees help to protect properties on Woodhouse Lane from the noise of the M62 and reduce pollution. Open space This development will result in a loss of open space and areas for walking for residents and a loss of agricultural land. Green space is valuable and provides a haven for residents to spend their free time. Business and economy It has been widely analysed in the media that traffic congestion costs UK economy £4.3 billion a year. The levels experienced in Brighouse can therefore only have a negative effect on the

economy of the local area and deter people from visiting. A further 4,500 houses planned for Brighouse could result in up to an extra 9,000 cars living within the town and travelling on the roads adding to congestion. Environmental health There will be a significant increase in air and noise pollution not only during the construction phase but as a result of the new properties and additional traffic. There will be a loss of visual amenity for the properties who live on Woodhouse Lane, many of whom paid a premium for their houses due to the open space to the rear. Green Belt According to the National Planning Policy Framework (NPPF) paragraphs 79 to 92 the fundamental aim of the Green Belt is to prevent urban sprawl. The Green Belt serves 5 purposes; 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 to preserve the setting and special character of historic towns to assist in urban regeneration, by encouraging the recycling of derelict and other urban land The proposals outlined in the Local Plan directly challenge each of the above purposes. The areas of Calderdale and Kirklees will become one, only separated by the eye sore of the M62. There will no longer be any distinction between the two, Brighouse and Bradley will have no green areas to separate them. There are many brownfield sites available throughout Calderdale and it is questioned why they are not being utilised instead of the Green Belt? The Green Belt should only ever be used as a final resort and only in a scale which is suitable to the local area, not merely due to the convenience of having a large area and the economies of scale to build on it. The NPPF also states that; 'once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land'. Once again these proposals have not been taken into consideration by Calderdale Council as the plan will not enhance the landscape, visual amenity and biodiversity. Nor will it improve the land which is there at present. There are no opportunities proposed to provide access to sports or recreation for the additional number of people who would be living in the area. England has 14 Green Belts in total, covering 13% of the land. It is for this reason that they should be protected and not exploited. There do not appear to be any 'very special circumstances' as required for Green Belt development to this application. The only benefit it would appear is the financial benefit to Calderdale Council despite their clear disregard for local residents. The development is wholly inappropriate by virtue of its size and appearance and should therefore not be allowed. Calderdale has a number of brownfield sites available which are not been proposed for development even though they would be more suitable. Community Infrastructure Levy (CIL) Why has the CIL been set at £85/sqm for Hebden Bridge and only £40/sqm for this site? Surely using differential rates is encouraging development in one area over another? Brighouse will be suffering from a complete overdevelopment and will not be financially benefitting at the same rate as Hebden Bridge would with a higher CIL.

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

Duty to Co-operate Reason:

Suggested Modifications:

Assess brownfield sites rather than just Green Belt. Make development more proportionate throughout Calderdale.

Additional Evidence Link:

Comment ID **Lpp436**

Site ref (if applicable): **LP1451**

Person ID: **1069977**

Name: **Mrs D Jagger**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Do you consider the plan to be Sound?: **Yes**

Sound Reason:

With appropriate landscaping and buffer zone we would support the allocation provided we can influence the quality of design and materials along with the assurance that no access road will cross any part of our land including the grounds of Toothill Green Cottage. It is 'Peace of Mind' that we are after. So with the above in mind and subject to your agreement to the points raised our land would be available.

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 **Lpp437**

Site ref (if applicable): **LP1451**

Person ID: **1130462**

Name: **Mr Peter Jagger**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Do you consider the plan to be Sound?: **Yes**

Sound Reason:

With appropriate landscaping and buffer zone we would support the allocation provided we can influence the quality of design and materials along with the assurance that no access road will cross any part of our land including the grounds of Toothill Green Cottage. It is 'Peace of Mind' that we are after. So with the above in mind and subject to your agreement to the points raised our land would be available.

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 **Lpp44**

Site ref (if applicable): **LP1451**

Person ID: **1128551**

Name: **Mrs Anne Aspinall**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Please see the attached representation which sets out in detail why I consider that the Plan and allocation of site LP1451 is unsound.

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

Duty to Co-operate Reason:

Please see attached representation which sets out in detail why I consider that the Plan has not been prepared in accordance with the Duty to Cooperate.

Suggested Modifications:

Please see attached representation which seeks the modification to the Local Plan through the deletion of allocation LP1451.

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5050404>

Comment ID **Lpp446**

Site ref (if applicable): **LP1451**

Person ID: **1181866**

Name: **Mr Nigel Riach**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

When George Osborne announced the garden suburbs programme in 2016, he stated that they would be small settlements on the outskirts of existing towns, not extensions of the existing communities. It was also stated at the time that green belt protection would remain in place they could not be imposed on existing communities. Assuming that these assurances were subsequently enshrined in the enabling law, the garden suburbs at Clifton and Woodhouse do not legally comply. The proposals are also contrary to the council's own green belt policy in that: They constitute urban sprawl, and must be prevented. They will cause neighbouring urban areas to merge. They are encroachment onto areas of countryside, where the need for its preservation is at its highest, particularly given the poor air quality in Brighouse. They do preserve the essential character of Brighouse and Clifton, which will be lost if the plan remains unchanged.

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

Sound Reason:

The Woodhouse proposed development of 1250 houses is not sound, inter alia, for the following reasons: Access roads to the site are often choked with traffic and are therefore already at capacity. Traffic to Woodhouse Junior and Infants School, and Toybox Nursery exacerbates this problem, and another school within the proposed development would cause complete failure of the infrastructure. Legitimate parked cars by current local residents often cause local roads to become single track roads. These roads form the access to new development at Woodhouse, namely Daisy Road and Woodhouse Lane. Daisy Road has a children's play area and football field opposite its junction with Woodhouse Lane, and also gives frontage to Woodhouse Junior and Infants school. Woodhouse Lane is extremely narrow in places, and often lacking in adequate footpaths. To introduce more traffic onto these roads is irresponsible. Woodhouse Lane leads into Birds Royd, which provides access to many employment facilities and the railway station. Delays at its junction with Huddersfield Road can already amount to twenty minutes or more, in my experience. I have spent most of my life involved in property development, I cannot see how this proposed development will not have a severe traffic impact, and I cannot envisage any infrastructure improvements that would alleviate the problem to acceptable levels. Air pollution is already an issue at the above mentioned school, not to mention Brighouse itself, and the traffic to the new development will cause this to become catastrophic. The loss of green space will reduce the air quality still further. It should be noted that the trees in Bradley Wood are gradually being reduced in number by the expansion of the scout camp, so the further reduction in "nature's air cleaners", or "green lungs" must be avoided. The people of Brighouse already have some of the poorest air in Britain - these proposals will only make that worse. Given that garden suburbs are, by definition, low density housing, therefore "land hungry" per house, there does not appear to be sufficient room for the 4.5 hectare school site mentioned in the plan. The type of housing likely in the garden suburb environment will be large, and therefore expensive. Accordingly, most of the house owners will be commuting into Leeds and other large towns and cities, as there will be insufficient demand from local people. Current demand for such properties is well catered for. Traffic generation will be huge from such houses, most of which will have at least two cars. Huddersfield Road often has significant traffic tail backs as far as the motorway bridge or further. This can happen at any time of day, and is caused by the most minor of issues. It is clearly operating at capacity or thereabouts. An additional 2000 car users disgorging onto it will surely cause gridlock. Unless and until the proposed junction 24A is finalised, no development in the vicinity should be undertaken. Doctors surgeries are operating at full capacity in Brighouse currently, so additional housing on this scale will not be absorbed. Similar problems are likely to arise in terms of dentists etc. For example, appointments at my dentist generally involve a wait of around 1 month. Flooding in Brighouse and at the Old Mill, Wakefield Road, has been a problem in the past, and the proposed extensive development will only make matters worse, but increasing surface water run off. Calderdale Council says one of the benefits of the development of so many new houses in the borough is that people will not have to leave the area to find housing, and therefore separate families. Surely, there is not such a huge need in the Brighouse area, and no need for Todmorden etc? Also, as stated previously, given the likely cost of buying a house in these garden suburbs, most buyers will be coming into Brighouse from other areas, and commuting back.

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

Duty to Co-operate Reason:

With a proposed development of around 200 houses at Bradley, on the opposite side of the motorway from the Woodhouse site, and other development on Huddersfield Road, there is a clear lack of co-operation between Kirklees and Calderdale. Large parts of Bradley Wood have already been lost to the scout camp, and the loss of trees and green space in the area, as a result of these developments, is highly irresponsible.

Suggested Modifications:

Additional Evidence Link:

Comment ID **Lpp45**

Site ref (if applicable): **LP1451**

Person ID: **680755**

Name: **Mr Michael Ellis**

Organisation: **Director Wilson Ellis Ltd**

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:

No cross boundary consultation can have taken place, Kirklees Council have approved housing on the golf course that abuts Bradley Road. Calderdale Council seek to build 1257 houses behind Woodhouse Lane that equates to 3 to 4 thousand house built in the area that is only split by the M62. The soundness of this type of planning has to questioned. The main roads that are affected by any development are Bradley Road and Huddersfield Road. At present both Bradley Road and Huddersfield Road are bottle necks and unusable at certain times of the day. Also not every body wants to live on a large housing estate, instead of going for very large sites to cover the numbers that are required, smaller sites in different locations should not have been filtered out. There has been no consideration for people who wish to down size to smaller homes on smaller sites particularly bungalows. Central government has made planning statements re down sizing with people moving and releasing large houses when the family has flown, moving to something smaller like a bungalow. There is no incentive or desire for a person to move from their family home on to a large housing estate so the person stays in the house. It not always about numbers its what people want and where.

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 **Lpp497**

Site ref (if applicable): **LP1451**

Person ID: **967544**

Name: **Mrs Alison Temple**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Do you consider the plan to be Sound?: **Yes**

Sound Reason:

I support the council's policy to develop urban suburbs. This will enable adequate infrastructure and facilities to be provided for the people who live there.

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 **Lpp510**

Site ref (if applicable): **LP1451**

Person ID: **961958**

Name: **Crosslee plc**

Organisation: **Crosslee plc**

Agent ID: **1104252**

Name: **Mr Mark Eagland**

Organisation: **Peacock & Smith**

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

Legal Compliance Reason:

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

Sound Reason:

Crosslee notes that the Council is seeking to allocate a new garden suburb for 1,257 dwellings at Rastrick. Our client is concerned that the proposed allocation does not include any land set aside for employment in this large housing scheme. Such provision would help to provide for local employment opportunity for the occupants of the new homes and foster sustainable travel patterns. Para 72 of the NPPF indicates that when planning for larger housing schemes consideration should be given access to (inter-alia) employment opportunities within the development itself or in larger towns to which there is good access. In this context the Local Plan does not justify why the proposed garden suburb could not accommodate an element of employment land. The Lichfields Employment Land Study indicates that the demand for employment land is greatest where sites have good access to the M62 motorway and that accessibility to this key transport corridor is one of the Borough's main strengths from an economic perspective. The proposed garden suburb at Rastrick would have good access to the M62 and we therefore question the logic of not including land for B class uses within this draft allocation.

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

Duty to Co-operate Reason:

Suggested Modifications:

The proposed garden suburb at Rastick should include an element of land for B class uses. If such uses are ultimately not provided for, then this should be justified by the Local Plan

Additional Evidence Link:

Comment ID **Lpp520**

Site ref (if applicable): **LP1451**

Person ID: **955435**

Name: **Mr David Ramsden**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The plan is not legally compliant for the following reasons:- Inadequate public involvement Throughout the development of the Local Plan it has been emphasised by the Planners that the views of the public are of importance. Sentences such as 'consultation and engagement are central to its preparation' which have appeared in some documents illustrate this point. I feel strongly that the way the Planners collected and used the comments gathered during the Public consultations did not result in a fair representation of their opinions. The public were directed from all quarters to use a computer based method supplied by the Planners to submit their comments, with negligible advice for those who were unable to use a computer. My feelings on this matter lead me to submit a Comment to the Planners on 5/09/17 (comment LPD831) which is the basis of what follows. This computer based method of public consultation was totally unsatisfactory. It effectively excludes anyone who was not very computer literate. This is something I have complained about by email to the Spatial Planning Team on more than one occasion. According to an information booklet produced by Calderdale Council describing how to consult, the advice given to those who have not the necessary computer skills is to visit a local library and collect a form to complete. Not a very accommodating approach to what must include about half the population.. As far as the residents of Brighouse are concerned this Public Consultation concerning the Publication Draft Local Plan is the most important Consultation of all those that have taken place during the preparation of the Plan, yet the current Consultation organised by Spatial Planning involved only one 'drop in' session for Brighouse. Fortunately the local MP organised further public meetings and The Brighouse Echo ran features which were written by a reporter, not one of the participating officers. Without these two contributions very few people would have any knowledge of this Consultation. The presentation of the Consultation document in the unfamiliar form of a large number of numbered and titled sections, each with its space for a response, can only be off putting to the potential respondent. This sectionalisation of presentation is not the normal way a resident would express themselves. If the view of all the interested population was sought, why were not submissions in all formats encouraged? In view of the many and wide implications of the Local Plan on the future life of the local residents, I would expect that every effort would have been made to describe, in a language understandable to the residents, exactly what is proposed in the Plan. The dissemination of this information should involve delivery by post to each residential address and the publication of articles in newspapers, written by knowledgeable authors. My feeling is that the response to the consultation was very much reduced because of the large number of residents who were not sufficiently computer literate. Many of the computer literate residents, I suspect, will have found the amount, range and content of information on the Consultation Document overbearing and consequently will have decided not to contribute.

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

Sound Reason:

Soundness The plan is unsound as it fails to give the population any important choices, only an opportunity to comment on predetermined designations The Garden Suburb and loss of green belt. Land designated as green belt should, according to the definition of green belt be protected from development. except in exceptional circumstances. The proposal in the Draft Plan is to change the status of a most attractive and

appreciated area of green belt to residential and in the design of a Garden Suburb. Since there are few details concerning a suburb in the Plan, further comments in this submission will concentrate on matters supporting the arguments for retaining the green belt status of the area. . The case for retaining PL1451 as Green Belt In 1973 a Planning Application was made by West Yorkshire County Council to erect a Comprehensive school in land originally LP1485 and which is now a large part of LP1451 which is the site referred to as the Brighouse Garden Suburb. The site is boarded by Woodhouse Lane, Bradley Woods, Sheperds Thorn Lane and Firth House Lane. At the same time the land owner submitted an alternative application to build houses on half of the same site. These two applications led to a Local Inquiry which I attended and have the paper work. The outcome of the Inquiry was described in letters stating that the Secretary of State for the Environment accepted the Inspector's decision and rejected both applications. Consequently the site has remained green belt ever since. The reasons given by the Minister of State for this decision to maintain the green belt status of the site were explained in the letter. To quote; ' I consider it unfortunate that the site now suggested for a proposed school should not only be within the approved green belt but also where within the borough the mainly open land is only some 400 yds to 500 yds in width. Buildings on this part of the green belt would result in considerable change in the appearance and narrowing of this break. ' 'However not only is there a clear presumption against residential development here unless exceptional circumstances exist, which in my opinion they do not' One of the primary functions of the green belt is to maintain a break or open space between towns. At the time of this decision the narrowing of this break referred to that between Huddersfield and Brighouse. The break now separates Kirklees from Calderdale and is actually reduced in the Draft Plan. A second reason given by the Secretary of State for rejection of the two applications to release this site for development concerned access. The letter from the Secretary of State reads; 'So far as access issues are concerned, the development would have to be served by either or both of the narrow lanes adjoining the site frontage and the appellants have no control over the land which would be required to afford satisfactory pedestrian and vehicular access. Shepherds Thorn Lane already joins Woodhouse Lane close to its junction with Huddersfield Road where traffic problems exist and the proposal will increase them .' In the early stages of the Draft Local Plan, the same roads mentioned above will serve any development. If traffic problems were identified in 1973, what will be the situation if the Local plan is adopted? The Secretary of state is the highest authority on planning matters. Why has this decision of 1973 not even been mentioned in this document or in any Planning Document despite my frequently mentioning of it. By what justification does the Local Authority disregard and overturn the decisions of the Secretary of State? It is true that 1973 is a long time ago, but in terms of the criteria defining green belt little has changed and a green belt designation is made with the long term in view. Open Space The open countryside plays a large part in the provision of pleasure, contentment and wellbeing of a large proportion of the population. Much of the countryside is designated as green belt and this is the case with site LP1451. The amenity value of this open space site can best be illustrated by specific examples. Bradley Wood Scout Camp, a nationally known and highly regarded Scout Camp, has a long common boundary with the land under consideration and access to the camp is along Shepherds Thorn Lane. . The Camp is visited by Scout and Guide groups and certain adult groups. The Camp is currently situated in a wood that is surrounded by open fields of which is LP1451 is one. Many of the young campers during their stay walk along Shepherd Thorn Lane, where they enjoy open views over arable land, then along Woodhouse Lane and return to the Camp along Firth House Lane where they will experience open views and farm buildings and possibly of farm animals. For some the visit will be their first visit to the countryside. If the open space is replaced with houses the camp site will have a much reduced impact particularly on the young. It will be reduced to a camp embedded in a residential area. Area for walking The area LP1451 proposed for residential housing is presently ideal for walkers with well marked routes and maintained gates and styles. Walking in this area is mainly on the flat and much of which is clean under foot. More ambitious walkers can divert through Bradley Woods on a circular route. This valuable open air amenity is appreciated by the residents of Woodhouse and further afield and should not be destroyed as a result of development. Two further reasons for retaining green belt status are that the land is excellent farm land which has recently been reseeded and that it forms a section of the wild life

corridor. In conclusion, this area of land should only be released from its green belt status under extreme circumstances and as a last resort when all alternatives have been considered. There are no details provided with the Draft Publication Plan of alternative Plans that could have been put forward to replace LP1451. Several combinations of sites must have been considered by the Planners before selecting the combination of sites subsequently to have been named Brighthouse Garden Suburb. The public should have been given details of these viable alternative site combinations from which to make a choice. Modification of the Local Plan . The whole of LP1451 be retained as green belt. Failing this the suburb be reduced in area to leave a large proportion of the site as green belt

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 **Lpp58**

Site ref (if applicable): **LP1451**

Person ID: **951143** Name: **Mrs Lynda Howard** 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 to the land allocation use at LP1451 between Woodhouse Lane and Bradley Wood. The number of houses ie 1257 planned for this area seems way too many. It's a lovely green area of Brighthouse well used and well loved by generations of local people. How on earth will Woodhouse Lane cope with the number of extra cars? It's already an unsuitable road for the vehicles that use it now. Plus are you planning to build another school? Woodhouse Primary School will not be able to cater for the extra school age pupils and the residential area around the school is already packed with cars as school starts and finishes. With so many houses there will be a need for bus services as it will be quite some walk from one end of the estate to the nearest bus stop. How will the local doctor's surgeries be able to cope with this additional flood of people? Then of course there is the large well used green area that will vanish which is one of the things that makes the Woodhouse area so attractive for the residents of the area. Bradley Scout camp will also be damaged it's hardly going to have the same element of adventure and excitement for young people if the camp has the roar of the M62 on one side and 1257 houses staring down on them on the other sides. Please leave Brighthouse's green areas alone.

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 **Lpp605**

Site ref (if applicable): **LP1451**

Person ID: **1183481**

Name: **Harrison Family**

Organisation:

Agent ID: **1183339**

Name: **Mr David Storrie**

Organisation: **Planning Consultant Storrie Planning**

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 allocation of site LP1451 omits land at The Gatehouse. This site fronts Huddersfield Road and would assist in providing safe access to the site. The omission of this land from the allocation does not allow an opportunity to maximise the development opportunity of this large allocation by providing safe and flexible access points to the wider highway network. see attached submission.

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

Duty to Co-operate Reason:

Suggested Modifications:

Please see attached documents. The Gatehouse site should be included as part of the Garden suburb

Additional Evidence Link:

<http://calderdale-consult.objective.co.uk/file/5074590><http://calderdale-consult.objective.co.uk/file/5077293>

Comment ID **Lpp643**

Site ref (if applicable): **Lp1451**

Person ID: **1183505**

Name: **Miss Georgia Wallace**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

No assessment has been made on the increased numbers of vehicles against these targets and the impact of the health of residents. Insufficient consultation with Kirklees and Bradford on the cumulative impact on air quality of all allocations in Calderdale and their plans

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

Sound Reason:

No assessment has been made on the increased numbers of vehicles against these targets and the impact of the health of residents. Insufficient consultation with Kirklees and Bradford on the cumulative impact on air quality of all allocations in Calderdale and their plans

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

Duty to Co-operate Reason:

Cross boundary consideration has not taken place to understand the cumulative impact of all development sites 1800 houses in Kirklees will back onto the 2400 houses planned in Woodhouse. no commitment to co operate

Suggested Modifications:

Additional Evidence Link:

Comment ID

Site ref (if applicable): **LP1451**

Person ID: **680755**

Name: **Mr Michael Ellis**

Organisation: **Director Wilson Ellis Ltd**

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:

Calderdale spatial planning department when putting forward the future plan have no fail safe provision in the plan for delivering what type of house is required in which area. Site reference no LP0006 for approximately 10 houses was dropped in favor of a site across the road site LP1451 for approximately 1200 houses. In dialog with the planners site LP0006 was put forward as a small immediate deliverable site for bungalows. "which are desperately needed in the area" During the time taken from when the site was put forward and until its filtering several people who had been made aware of the possibility of bungalows on the site had made enquires re-purchasing allowing them to stay in the area by down sizing so releasing a family home. The soundness of the decision to filter the site in favor of a site that has no infrastructure, no delivery date, and there's no real control over whats built and when is Questionable, also consideration should be given to the people in the area wishing to down size and their requirements., that is feeling safe in their living environment. Moving from a large family home on to a housing estate is not appealing to the bungalow seeking individual. We would ask the inspector to look at the site no LP0006 re it's delivery of Bungalows along side site LP1451 as to that site desirability, and deliver-ability of the required bungalows and when.

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 **Lpp68**

Site ref (if applicable): **LP1451**

Person ID: **1181857**

Name: **Miss J Parkin**

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?: **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: <http://calderdale-consult.objective.co.uk/file/5055129>

Comment ID **Lpp685**

Site ref (if applicable): **LP1451**

Person ID: **1129560**

Name: **Mrs Shona Hardacre**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I feel the whole consultation process has been rushed through with as little notice and information given to the public as possible. Meetings have been arranged at short notice and often at days or times when people who work cannot attend and when its impossible for people with small children who have early dinner/bedtimes. I dont believe any of the plans / proposals have been written in an every day language that ordinary people without legal / property / planning backgrounds can understand. I also feel the whole process has been deliberately difficult for people to navigate and, for many older residents or those who are not computer literate, it has been practically impossible and simply put them off commenting altogether! The online portal I am currently typing into is in tiny text boxes with scroll bars to the side making it impossible to see most of your own comments as you type, making it more difficult and time consuming. How can it ever be legal to build on green belt?? So called protected land??!

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

Sound Reason:

I do not feel this plan is sound, nor is it consistent with the National Planning Policy Framework. My main

concerns concerns are: "ç Traffic, Road Infrastructure and Air Quality Brighouse already experiences high volumes of traffic, particularly when there are issues with the M62 motorway with many M62 users diverting off as early as Rishworth / Ripponden and trying to rejoin the M62 at Brighouse - this leads to congestion through all areas in between such as Elland, Fixby and Brighouse. Likewise any issues in or around Leeds Road at Huddersfield, such as accidents or home games for Huddersfield Town, often contribute to additional traffic flowing through Bradley and Brighouse in order to reach the M62 when access from Cooper Bridge is not possible / congested. Woodhouse Lane is a rat run for many vehicles trying to avoid the heavy traffic on the main Huddersfield Road and also those cutting down to the industrial estate at the bottom, particularly when it is queuing down to Brighouse town centre. Incidentally, the majority of these vehicles using Woodhouse Lane as a cut through completely disregard the new 20mph speed limit in order to make the cut through worth while! Its dangerous for The primary school children and even just residents trying to pull out of or reverse into their drive ways. The offset junction on Huddersfield road with Toothill Bank/Woodhouse Lane is already an accident hotspot. A high increased in traffic levels on these roads from Huddersfield Road toward the LP1451 site would undoubtedly make this situation much worse and eventually lead to fatalities. Given that an additional 1,250 houses on the green belt land on site LP1451 would suggest at the very least an additional 2,500 plus cars, this alone would be too much traffic for our current road infrastructure to cope with. When you add to this additional traffic for the 193 houses within 0.5 mile down Toothill Bank, the new Enterprise zone (site LP1618) and the proposed developments within 2 miles in Kirklees of 2,350 houses, the Clifton garden suburb and enterprise zone, plus any other nearby developments it is likely normally every day journeys to school, work etc would become almost impossible, no doubt taking significantly longer than they do at present which will add to queues and therefore pollution from traffic fumes. I understand that Huddersfield Road/Toothill Bank/Woodhouse Lane is already currently being tested as an Air Quality Management Area - it doesn't take a genius to work out that an increase of this level would have detrimental effects on local residents and school children, reducing life expectancy and causing additional health problems which will in turn cause a greater strain on the NHS and local doctors / hospitals etc. There are already Government policies on reducing traffic and improving air quality - have any of these been considered at all? We are already fighting many serious health complaints for children such as obesity, severe allergies and asthma - with the sort of pollution levels likely to come from such additional traffic how are our children supposed to safely play out or exercise/do outdoor PE at school or at home without suffering additional problems such as skin complaints? Or if they do suffer an asthma attack - how is an ambulance expected to get through to them in time with such bad/high levels of traffic? "ç Loss of Green Belt Green belt exists in the national planning framework for many reasons, to check the unrestricted sprawl of large built-up areas, to prevent neighbouring towns merging in to one another, to help safeguard the countryside from encroachment and in order to help create a "green lung" between motorways and towns, allowing there to be a cleaner air pocket and help protect local residents. Building on our green belt will directly go against all of the above! "ç Flooding I object to the land at site LP1451 being developed due to the important role it plays in being part of the defence against flooding in the local area and potential impact on the river Calder, the Canal and the knock on effect to other areas within Calderdale and Kirklees. Flooding is already a serious issue in Calderdale with significant emergency plans and flood defence works already being implemented and paid for! Land such as LP1451 is very much needed to help to soak the waters away. The NPPF states that local planning must 'meet the challenge of climate change and flooding'. We are already failing at this and building on green belt will consistently add to the problem. The land at LP1451 lends itself to a nice slope heading straight down towards the river Calder and the canal basin in Brighouse which is classed as flood zone. Building on the land, removing trees and grass etc, will lead to significant surface water and that's only going to go one way - down hill and into the town centre flood zone, possible cutting off the main train line along the way and causing further travel issues for commuters. "ç Local Amenities and Service Infrastructure The planned amount of additional houses and residents to the Brighouse area will completely overstretch our local amenities and services which are already failing to cope with demand. Getting a doctors appointment can be impossible

with patients often waiting weeks for appointments. My husband has recently had surgery which has required him to have a wound cleaned, packed and dressed every single day - the only reason he has managed to have this done every day is because the nurses showed me how to do it as there simply were no appointments available for him to be seen! I have seen no plans for additional GP / doctors surgeries for the area and with the planned closure of Huddersfield hospital (HRI), and as touched upon in earlier comments, a likely increase in health complaints due to increased volumes of pollution etc, how are our health services expected to cope? All schools within the Brighouse area are already oversubscribed and simply adding plans for an additional school to the plan will not solve the problem - where will the teachers be sourced to staff it when there is already a national shortage? Where will the budget for the additional school come from? Once the children of the primary school are past primary level, which secondary school will they be able to go to when Brighouse and Rastrick are both already oversubscribed?? Has anyone factored in the extra traffic another school would add to the already problematic traffic system in Brighouse?? Trains - our National railway system is already a joke. Having previously commuted to Leeds from Brighouse for many years, I can personally confirm that the train service in and out of Brighouse is already insufficient for the towns needs. When trains arrive, often late, passengers are often unable to even get on as they are full already and at standing room only, with many passengers having to wait for the next service. The current level of service that operates from Brighouse, in both directions, already cannot cope so adding in potentially hundreds of additional users/commuters is likely to cause even more problems. For all of the above reasons, together with many more I cant even begin to put into words, nor have the time to do so within this extremely difficult online system, I completely object to the development at not only siteLP1451 but all of Brighouse, Rastrick and Clifton. I feel our town and its surrounding areas have been allocated for a disproportionate amount of development when there are other sites within Calderdale, many of them brown field and not green belt, which would be far more suitable for additional, smaller developments that would not cause the destruction currently proposed for Brighouse. What about our local wildlife? The fields to the rear of Woodhouse Lane, Bradley Woods and the surround trees etc are currently home to deer, foxes, owls, bats, squirrels and many species of birds, insects, mice/rats/voles/shrews and goodness knows what else - not to mention wildflowers and plants which in turn aid the Bees which are already suffering detrimental effects to their numbers and in turn our crops and food supplies etc. Has anyone considered the effects on facilities such as the West Yorkshire Scout Camp in Bradley Woods? With children coming from all over West Yorkshire in order to experience the outdoors and "green spaces". Building and development of either side of these woods is bound to have a detrimental effect. For many children this can be their only experience of the great outdoors, nature and wildlife and in turn gives them exercise - this in turn provides health benefits, although not if all they breathe in is traffic pollution!

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

Duty to Co-operate Reason:

Whilst I'm sure the Council has taken whatever necessary steps they need to take to ensure they look like they are co-operating, I dont feel this process as been fair or easy for residents and locals. As previously mentioned in my earlier comments, i feel the whole consultation process has not been user friendly and there have been issues such as the website being down making it impossible for people to comment. There definitely appears to have been minimum effort to contact residents regarding their views and comments. Have Calderdale and Kirklees Council co-operated and discussed local developments between themselves? The proposed plans would develop the Woodhouse Lane side of Bradley Woods whilst Kirklees have already planned to develop the Bradley side of Bradley Woods - this will result in the area either side being fully developed and in turn have detrimental effect on Bradley Woods, local walking routes and nature and wildlife in the area.

Suggested Modifications:

The apportionment of development planned for Brighouse and the immediately surrounding areas should be reviewed, with a large proportion of the housing required being reallocated evenly throughout Calderdale. Traffic surveys, flood assessments and infrastructure assessments etc should all be undertaken before even considering releasing green belt land for development.

Additional Evidence Link:

Comment ID **Lpp688**

Site ref (if applicable): **LP1451**

Person ID: **1183100**

Name: **Mrs claire lane**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I do not feel the Local Plan is legally compliant. A provision of an extra 4500 houses around Brighouse and Rastrick is unbelievably disproportionate within the area of Calderdale. Brighouse is a small town and proposed sites will increase the size by 31%. Environment Noise pollution - The constant hum from the motorway and Huddersfield road is already a nuisance and has been recorded as high. Air pollution - Figures exceeding the acceptable level have been taken from sites around the proposed area. Habitats for local wildlife - Deer are often grazing at the proposed site, these beautiful animals along with native creatures will undoubtedly be disturbed. We hope you are aware of local habitants which include; bats, dormice and a wide array of birds. Infrastructure Lack of infrastructure proposals are extremely disconcerting. Commodities and services essential to enable, sustain and enhance living conditions have not been planned thoroughly enough to elevate concern provision will be suitable for new residents. Education- In the area of woodhouse there is one primary school which is already oversubscribed (as are many of the other local primary schools). 1257 new houses in this area would bring with them at least equal numbers of children who have the right to education. Brandon Lewis MP reported in 2016 that although providing high quality school places for every child is one of the government's top priorities, concerns have been since raised on how funding can be secured. Health - Doctors, dentists and hospitals are already at breaking point. The local GP and dental practices do not currently have capacity to accommodate 18,000 new residents. With plans to close Huddersfield Royal Infirmary, this will further strain services at Calderdale Royal. Roads - Unfortunately, our small town is often at standstill during the busier periods of the day which would be undoubtedly worsened. During morning rush hour Huddersfield road traffic often tails back to Toothill Lane, (with many non residents choosing to use Woodhouse Lane and Birds Royd Lane as a cut through to avoid tailbacks). This leads to a constant stream of traffic around a school area which should be limited to 20 miles per hour, this is NOT adhered to by most! We envisage further use of these smaller roads throughout and beyond completion of the development leading to increased traffic flow. As these roads are used by children walking to school, further infrastructure including speed humps and traffic cameras to promote road safety may be needed. Exiting the M62 at junction 25 is frequently challenging leading to waiting times of upto 45 minutes. If we are assuming that each of the households planned has two cars, we could have 9000 extra commuters leading to extended journey times which in turn will impact on quality of life and overall health.

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

Sound Reason:

I do not feel the Local Plan is sound. A provision of an extra 4500 houses around Brighouse and Rastrick is unbelievably disproportionate within the area of Calderdale. Brighouse is a small town and proposed sites will increase the size by 31%. Environment Noise pollution - The constant hum from the motorway and Huddersfield road is already a nuisance and has been recorded as high. Air pollution - Figures exceeding the acceptable level have been taken from sites around the proposed area. Habitats for local wildlife - Deer are often grazing at the proposed site, these beautiful animals along with native creatures will undoubtedly be disturbed. We hope you are aware of local habitants which include; bats, dormice and a wide array of birds. Infrastructure Lack of infrastructure proposals are extremely disconcerting. Commodities and services essential to enable, sustain and enhance living conditions have not been planned thoroughly enough to elevate concern provision will be suitable for new residents. Education- In the area of woodhouse there is one primary school which is already oversubscribed (as are many of the other local primary schools). 1257 new houses in this area would bring with them at least equal numbers of children who have the right to education. Brandon Lewis MP reported in 2016 that although providing high quality school places for every child is one of the government's top priorities, concerns have been since raised on how funding can be secured. Health - Doctors, dentists and hospitals are already at breaking point. The local GP and dental practices do not currently have capacity to accommodate 18,000 new residents. With plans to close Huddersfield Royal Infirmary, this will further strain services at Calderdale Royal. Roads - Unfortunately, our small town is often at standstill during the busier periods of the day which would be undoubtedly worsened. During morning rush hour Huddersfield road traffic often tails back to Toothill Lane, (with many non residents choosing to use Woodhouse Lane and Birds Royd Lane as a cut through to avoid tailbacks). This leads to a constant stream of traffic around a school area which should be limited to 20 miles per hour, this is NOT adhered to by most! We envisage further use of these smaller roads throughout and beyond completion of the development leading to increased traffic flow. As these roads are used by children walking to school, further infrastructure including speed humps and traffic cameras to promote road safety may be needed. Exiting the M62 at junction 25 is frequently challenging leading to waiting times of upto 45 minutes. If we are assuming that each of the households planned has two cars, we could have 9000 extra commuters leading to extended journey times which in turn will impact on quality of life and overall health.

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

Duty to Co-operate Reason:

There has been no information on planned infrastructure. As residents we would like to be involved in potential developments. We appreciate the need for affordable housing but as this area has been chosen for proximity to the motorway (indicating their preferred target buyers are commuters), I am unsure this will address the local housing problem. As a commuter to Leeds and Wakefield myself, I can assure the reader of the current unmanageable traffic situation at rush hour through Brighouse and exiting the M62 at junction 25. These bottlenecks lengthen journey times by 50%. There is a need to address the huge implications on traffic flow to the area, I am aware that alternative motorway junctions have been 'proposed' but I am concerned that this will be sidelined once application has been awarded due to expected expenditure.

Suggested Modifications:

I do not feel the amount of housing planned for this area is appropriate for the commodities available.

Additional Evidence Link:

Comment ID **Lpp695**

Site ref (if applicable): **LP1451**

Person ID: **1044766**

Name: **Mrs Danielle Hirst**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I do not consider the local plan to be legally complaint for the following reasons: The Sustainability Appraisal Report for the proposed site is not included in this version of the proposed plan and was conveniently hidden away in the previous draft plan, meaning that many respondents were not even aware of its existence. I am a computer literate, professional person, who is used to using the internet for research purposes and yet I only came across the Sustainability Appraisal Report for the site by chance. Surely, the Sustainability Appraisal Report should sit alongside the Site Assessment Report, so that the two can be reviewed objectively together & an appropriate response formed. For this garden suburb site and other development sites in the plan, the Site Assessment Report is relatively easy to find on the Policies Map; however, the Sustainability Appraisal Report is not & so the public have not been given an adequate opportunity to critique it. The Council's Consultation Statement massively overemphasises the amount of community involvement that has taken place on the Local Plan and I think if you were to poll the residents of Calderdale, the overwhelming response would be that the community has been kept in the dark over the proposed plans. The council has seriously overemphasised its attempts at press releases & social media updates! Publicity about the Local Plan has mainly come from neighbourhood forums and our local MP. It has also been extremely difficult to navigate the council's website and find the supporting information, and that is for a computer literate person. Elderly people and other groups within the community have even less chance of gaining access to such information.

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

Sound Reason:

I do not consider the plan to be sound for the following reasons: The current NPPF advises that the local plan must be 'positively prepared, justified, effective and consistent with national policy'. I strongly feel that the current plan fails to be positively prepared or effective, as it is clear that many important concerns that have been raised by the public/community over the years have failed to be addressed by the council. These include the concerns relating to the serious lack of infrastructure to support the proposed development, the impact on highways, the loss of greenbelt and the contribution to air pollution issues in Brighouse. It seems like the council are simply 'going through the motions' and are failing to take on board or come up with any mitigation plans to any of the concerns raised. In its Sustainability Appraisal of the Local Plan 2018, the Council acknowledges that this proposed garden suburb will hugely impact the greenbelt and traffic situation in Brighouse "" this is clearly NOT a justified reason for the development to proceed. The individual Sustainability Assessment Report for this garden suburb site suggests there is only ONE positive outcome of the SEVENTEEN objectives, with 15 uncertain outcomes and one negative outcome. Surely, this cannot be a justified reason to put this site forward for development?! Finally""!"". In my previous response to the Local Plan, I detailed how the proposed development is not consistent with national policy, which in turn means the plan cannot be considered 'legally sound'. These inconsistencies are detailed as follows: Paragraph 31 of the National Planning Policy Framework states that: "Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development, including large scale facilities such as rail freight interchanges, roadside facilities for motorists or transport investment necessary to support strategies for the growth of ports, airports or other major generators of travel demand in their areas." THE TRAFFIC PROBLEM IN BRIGHOUSE IS UNDENIABLE.....unless you are either a recluse who never leaves the house or someone who commutes by helicopter. The whole town is virtually stationary at

rush hour & is gridlocked whenever an accident occurs on M62 or surrounding major roadways. I am told that traffic assessments have been carried out and no real concerns were raised - I would strongly question the validity of this conclusion and ask that more 'independent' surveys are carried out. The addition of another 1257 dwellings, along with the other 'Garden Suburb' at Clifton & the other smaller developments proposed for Brighouse is extremely alarming in terms of the impact on Highways. Around 6000 new dwellings in Brighouse will lead to a massive increase in the number of cars / road users associated with such development, which will push an already overstretched highway system to breaking point. Birds Royd Lane is one of the main roads leading to / from this development & is in a terrible state of repair, with numerous large potholes & exposed cobbles along its entirety. Surely, an access route to a large housing development through a poorly maintained industrial estate is not good planning? I have seen no information in the Local Plan which addresses the issue of highways / road infrastructure or the travel demands of the Brighouse area. I am extremely concerned that should this development go ahead, the impact on highways will be detrimental to the whole of Brighouse, it's residents & road users. In turn, this will negatively impact local businesses, damaging the local economy. Adequate infrastructure needs to be considered, consulted on & properly planned, prior to this development taking place. The National Planning Policy Framework document states that: The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. Green Belt serves five purposes: 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; to preserve the setting and special character of historic towns; and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Should this development (along with the garden suburb at Highmoor Lane) go ahead, our precious and dwindling greenbelt land surrounding the Brighouse area will be IRREVERSIBLY damaged. It appears that the council's planners have glanced at the maps of Brighouse, identified some large green, open space areas (regardless of their greenbelt status) and considered them as suitable sites, without considering their importance in relation to the points listed above. Along with the similar large housing & commercial developments proposed by Kirklees council, it is clear that our green belt is massively under threat and we should do everything we can to preserve it. Green belt serves to provide areas of recreation for people of all ages and abilities including walkers, runners, cyclists & others wanting to enjoy the countryside in their local area. It is a vitally important leisure / recreation resource, which should not be underestimated & serves to enhance peoples' health and well being. Not to mention it is home to a huge range of plants & animals, which add to the richness of our local environment. Finally, as stated in the list above, our greenbelt serves to check unrestricted sprawl of urban areas & prevent neighbouring towns merging into one another. This development, along with the developments planned in Kirkless, will effectively see the two towns of Brighouse and Huddersfield merging together. One of the National Planning Policy Framework's 12 core principles is set out as follows: "Support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources" More specifically in terms of flooding, it also states that: "When determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere" The proposed development at Woodhouse Lane, clearly does not take into consideration the increased flood risk caused by building large housing developments on green belt land, so close to the River Calder. Brighouse suffered terribly in the Boxing Day floods of 2015 and it is simply common sense that more development will in turn create more surface run off, less infiltration & attenuation of rain water and therefore increased river levels & flooding. Bradley Park Dike (a stream) drains from this site, underneath the railway line & into the River Calder & this particular stream is at maximum capacity during periods of high rainfall. What will happen if 1200+ new homes are built around it? It seems fairly obvious to me & I'm no expert in flooding. Whilst flood risk assessments will no doubt be required and 'mitigation' measures recommended, nothing can substitute the value of retaining our open spaces as part of the flood risk strategy.

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

Duty to Co-operate Reason:

I do not consider that the plan complies with the duty to co-operate for the following reasons: I am very sceptical about the actual level of co-operation between Calderdale Council and the neighbouring Local Authorities of Kirklees and Bradford. The Duty to Co-Operate Statement produced by Calderdale Council has some vague outcomes of meetings between the authorities which include the following: 'SE Calderdale /N Huddersfield Delivery Plan Scoping Report/Cross boundary working "" DISCUSSIONS ONGOING' 'Cross boundary planning issues - DISCUSSIONS ONGOING' Other outcomes of meetings between the authorities include the following: 'Both authorities to continue monitoring issues discussed and pursue statement of common ground' 'Both authorities to continue monitoring issues discussed to determine if any joint working required' In my opinion, continued monitoring and 'discussions ongoing' is simply not acceptable evidence of the Council's compliance with their 'Duty to Co-Operate'. The proposed plans for Brighouse will change the shape of Brighouse forever and so Calderdale Council must have a coherent local plan, that has been fully appraised and co-ordinated with its neighbouring Local Authorities and their development plans. A perfect example of where this has not happened is the massive housing development proposed at Bradley Golf Course, which is adjacent to the garden suburb at Woodhouse and so will have a huge impact on traffic, pollution, greenbelt etc and it appears this has been overlooked.

Suggested Modifications:

Alternative sites must be explored and more priority given to Brownfield sites across the borough of Calderdale. Much more infrastructure is required to support this garden suburb, and a plan for this must be in place prior to the garden suburb plans being approved. If development on this plot of land has to go ahead, a much smaller development would be more appropriate and have more public support, as it would have less impact on the greenbelt, flooding, traffic/highways, air pollution.

Additional Evidence Link:

Comment ID **Lpp719**

Site ref (if applicable): **LP1451**

Person ID: **1183584**

Name: **Mr Richard Ribeiro**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Disproportionate Development Brighouse getting a disproportionate amount of housing development within Calderdale. Halifax much bigger (3 times) but taking less housing. Can see that proximity to M62 will be a factor but impact and demands placed on relatively small town of Brighouse will be significant. Infrastructure Brighouse already suffers as a bottleneck for traffic at peak times. This is due to route limitations due to rail line and river/canal. I personally commute to Wakefield 5 days a week and am regularly held up trying to traverse Brighouse at the start/end of my journey. The current traffic load is high and the addition of over 3000 homes will only make traffic load in Brighouse worse. Presumably many

of the new homes will have two cars and many of these will be trying to access and return to/from the M62. There are already longtailbacks on Wakefield and Huddersfield roads. It seems common sense to say that Brighouse can't and won't cope with an increased traffic load. I do not believe that a new junction from the M62 will help or indeed that there are many options to improve infrastructure. Schools and GP's are already overrun in the area and would not cope with planned expansion on this scale. Air Quality It is my understanding that air quality is already compromised in Brighouse. It is difficult to see how air quality will be improved with the addition of so any additional homes and cars. Flood/Surface Water I am concerned about the impact of developed land on water drainage and the steps which may be necessary to mitigate this. Ecology I am concerned about the impact of development on the local wildlife. There could also be an impact on local bat colonies. Summary Many people in the area including myself are staggered by the proposed scale of development in Brighouse. It appears to be over ambitious in the extreme! The additional housing would be added to the significant detriment of the town and surrounding areas.

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

Duty to Co-operate Reason:

I am not convinced the plan has taken into account the proposed development on the other side of the M62 off Bradley Road.

Suggested Modifications:

Significantly reduce scale of development,

Additional Evidence Link:

Comment ID **Lpp721**

Site ref (if applicable): **LP1451**

Person ID: **1183585**

Name: **Mr Regan Dickenson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

My understanding is that proposed allocation of land for a new primary school is less than the minimum legal requirement.

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

Sound Reason:

Questions regarding infrastructure provision - roads especially and with regard to to issues surrounding health and well-being, particularly regarding poor air quality and its mitigation have not been satisfactorily addressed. This is exemplified by the fact that the council has failed to address and mitigate air quality issues already present within the Borough. Proposals for a relief road from Bradley Bar to Wakefield Road would necessarily cut through and thus render bogus any notion of a garden suburb. Similarly, proposals for a 24a Motorway Junction that would impinge on the Ancient Woodland of Bradley woods has to be questioned on its poor environmental merits so close to a proposed garden suburb There has not been any detail offered with regard to CO2 emissions and their mitigation, especially with regard to housing design and energy saving, energy use and the incorporation of renewables in the housing design - solar energy,

photovoltaic panels etc. The use of greenfield and greenbelt land on this site would appear to be in breach on what the notion of greenbelt land is for, especially with regard to separation from neighbouring settlements. With the proposals from Kirklees to build on one side of the M62, and with this so-called garden suburb to be built on the other, there would be very little green space left to separate Kirklees from Calderdale. Therefore the argument that the use of a tiny fraction of the greenbelt land within Calderdale is specious, since it uses that land closest to other urban centres.

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

Duty to Co-operate Reason:

Kirklees Council has had problems with the Independent Inspector with regard to DtC. It can therefore be inferred that since this is a two way process, that Calderdale has done little more than perform a box ticking exercise with regard to DtC with its neighbours. Proposals on the plan are scant and vague and do little to address the issues they correctly identify. Consultation with the public has done little in the way of persuading the council to consider plans that might be more equitable and proportionate - current proposals would see the number of households in Brighouse and Rastrick increase by about 35% over the life of the plan which is unsustainable from structural, environmental and public health perspectives to name just three. This is in the face of the huge number of comments made which, beyond being statistically analysed, have had little difference in making the council think again and co-operate with the sentiments of its citizens.

Suggested Modifications:

Greater detail with regard to infrastructure provision, environmental mitigation as well as a reconsideration of a more equitable and proportionate distribution of housing allocation within the borough.

Additional Evidence Link:

Comment ID **Lpp863**

Site ref (if applicable): **LP1451**

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:

The traffic assessment for this site needs to include an interrogation of Calderdale's strategic transport model examining traffic volumes ('actual flow - total') as well as V/C ratios. 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. 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: - The Highways England Network Analysis Tool (NAT) indicates that the traffic generated and attracted by this site will have a significant traffic impact on the

strategic road network (SRN) at M62 junctions 24 and 25. The site has a major adverse impact on the operation of the SRN with NAT output showing a maximum peak hour link flow on the M62 of 159 vehicles generated by the site. - recent modelling undertaken as part of the Highways England West Yorkshire Infrastructure Study indicates that capacity improvement measures additional to the schemes included in the RIS will be needed on the SRN to cater for demand generated by development in Calderdale and neighbouring Districts during the period to 2030. - It is also suggested that development of this site not be commenced until later in the Plan period. Local highways issues: - Impact on proposed Junction 24A M62 likely to be severe. - Transport Assessments would be required to accompany any planning applications if the site is allocated; these would need to demonstrate that the proposals would not have a severe traffic impact. Summary of highways and access: There are likely to be impacts on the Strategic Road Network as a result of developing this site. - Site access is achievable and it appears three access points are possible. CMBC Highways Development Management Officers have requested a masterplan for the whole site to include a Transport Assessment to demonstrate the access points to the site and mitigation of the increase traffic impact. See the attached screenshot from the Calderdale strategic transport model.

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/5074083>

Comment ID **Lpp891**

Site ref (if applicable): **LP1451**

Person ID: **1183547**

Name: **Mr ADAM WILLIAMS**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

There has been almost zero communication with the residents affected by the intended planning. As a very concerned resident of the Woodhouse area, the lack of transparency or having a voice has been hugely frustrating. There has simply not been appropriate consultation or details provided around the plans. This was reflected by the provision of a single 'drop in session' which failed to provide answers or a platform on which to ask questions. Quite frankly, the people who were there in an official capacity neither answered my questions or helped, whilst giving a distinct sense of arrogance in that we were at a lost cause to stop/change anything. It is clear the lack of communication is due to the Council being just as aware as residents of the fundamental flaws of planning for such significant development in the area. The area simply cannot withstand such an increase in population, traffic and environmental devastation. The online portal on which to add your objections/comments has also been poorly communicated, extremely difficult to navigate and understand. I'm sure this must have made those who are less comfortable in using computers/the internet even more distant from the exercise. I believe I would have likely received more detail, greater communication and warning if my neighbour was planning an extension than I have had regarding the intended 1250 houses built on my back garden! How have Green Belt laws been pushed aside? My understanding of such laws is to protect these areas at all cost, why does this suddenly not seem to apply? Especially as the equivalent adjacent woodlands at Bradley/Kirklees have already been

designated for destruction. Which in itself also confirms there has been either no or insufficient consultation with neighbouring councils, the development of the Green Belt land at Woodhouse would see the removal of boundaries between Calderdale and Kirklees. The plans are laughable to say the least, they even contradict with the Councils own policies on Green Belt land.

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

Sound Reason:

Disproportionate levels of housing I don't think the following point requires any elaboration - Brighouse is only 3.9% of the Calderdale population, but is to receive 50% of the planned housing??? Air Quality I understand that our area is already missing air quality targets? If there are to be a further 1250 homes built there will likely be 2500 cars which will follow and increase air pollution. The destruction of the woodland will of course decimate nature's own solution to air quality, trees!!! Roads Living on Woodhouse Lane, we are already subjected to our street (which is saturated with kids going to school or heading to our wonderful park) being used as a 'rat run' to avoid ever increasing heavy congestion on Huddersfield Road. The highways presently in place could simply not handle the increased traffic from a circa 3000 further residents without grinding the Town to a halt and increasing the danger in our children walking to school or simply heading to the park to play. Infrastructure & Amenities Anyone who has tried to get a doctor's appointment recently will testify you have to be close to death to obtain an appointment within the same month as your illness! As a family, we join the local residents, cyclists, joggers, dog walkers, horse riders etc that use the amazing and varied routes throughout the woodlands in having a healthy family life. Our family walks through this land enable my children to learn and enjoy nature on their very doorstep, it also promotes community spirit in speaking to fellow passers by - all key reasons why we chose to move to the area! I cannot document the wildlife by species but can comment on the important role the animals who visit our garden from the adjacent woodlands have on our family life. My daughters love feeding the birds etc and simply love it when something unexpected jumps into our garden...all lost if this site is developed, forever! And with Bradley consigned to the same destruction, there is nowhere for the wildlife to go to. Schools Our move to the area (at our stage of life) was like most, driven by schools. My daughter thoroughly enjoys her time at Woodhouse Junior School and our experience as parents is the same. The teachers are fantastic, but I believe the class numbers are already higher than most parents would like - where will a potential further 750+ children go to school? This fundamentally affects the future and educational foundation of my children, a change which could be everlasting to the security, prosperity and enjoyment of the future lives. In a final comment, this planning is intended on the idea of a housing crisis! What housing crisis??? There are plenty of homes available, and sometimes when you are getting on the housing ladder - guess what, you can't always buy the home of your dreams in the area you want to be in straight away. You have to work & build towards it and for the timing to be right.

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

Duty to Co-operate Reason:

How can there have been sufficient engagement and dialogue with neighbouring councils? Borders will be merged/lost, highways which connect the towns will be saturated and there will be no areas of nature left? With regards to liaising with residents, I repeat my earlier comments... The online portal on which to add your objections/comments has also been poorly communicated, extremely difficult to navigate and understand. I'm sure this must have made those who are less comfortable in using computers/the internet even more distant from the exercise. I believe I would have likely received more detail, greater communication and warning if my neighbour was planning an extension than I have had regarding the intended 1250 houses built on my back garden!

Suggested Modifications:

Retain Green Belt areas (at worst, drastically reduce the planned number of houses) Explore the use of numerous brownfield sites first (that would actually improve areas, rather than worsen areas!) Distribute housing allocations with an even spread that make more practical sense and is fair

Additional Evidence Link:

Comment ID **Lpp896**

Site ref (if applicable): **LP1451**

Person ID: **1130346**

Name: **Mr M Chalker**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Recent consultation has been excessively brief, documentation wordy and difficult to understand "" particularly there is no mechanism to see changes from previous revisions. Core Strategy documentation relates to consultation from 10 years ago in 2008/9! In Brighouse only 17 people attended a workshop "" how can this be a current indication of people's views on the Local Plan when there are 3000 houses and an industrial park being proposed! The Plan Map is SIGNIFICANTLY MISLEADING when referring to sites LP1451/LP1463 - These show as 'REJECTED' and ARE NOT INCLUDED in 'New Housing'. This WILL DECEIVE people into believing no change is planned - Despite the fact the proposal is for OVER 3000 new houses in these two locations! They will not look for 'Garden Suburbs' which is meaningless to the public. The Sustainability Report contains arbitrary targets, and provides no evidence of need (Strategic Housing Assessment) within the Brighouse area. There are areas with missing targets and no indication that targets are meaningful and have been met before.

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

Sound Reason:

The scale of development proposed around the Brighouse area is not Sustainable and isn't justified within the plan. I can see no evidence (I'm unable to find any Strategic Housing Market Assessment Report) that indicates there is a sufficient need within the Brighouse area for such significant development. The Housing Stock Report included has no detail other than to show how many houses were sold in 2017! The Sustainability Appraisal has arbitrary targets listed "" such as reducing traffic impact on the environment by increasing Rail Journeys by 50%, 25% increase in bus journeys. Has the Council got a proven track record in meeting such - How did the Council SCORE against their UDP 2006 Section 9.3 Transport/Air Quality TARGETS? Reducing pollution, raising train travel 40%, limiting traffic growth and congestion etc. The Sustainability appraisal also has 'to be developed' against the 'Efficient Use Of Land' section. Similarly providing good employment for all "" is awaiting targets. How can the plan be regarded as sustainable if this hasn't already been measured objectively! All remaining greenbelt around Brighouse will be removed in this plan.

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

Duty to Co-operate Reason:

The provided Statement indicates discussions with neighbouring authorities have taken place, but fails to show any meaningful, proven and costed mitigations. Particularly in relation to transport, greenbelt and air

quality. Remarkably the housing stock report shows less detail for Brighouse than other areas, yet it is to take the vast majority of new housing and commercial building within the plan! The CMBC Local Plan Working Party appears BIASED - NOT ONE of the 7 Members is from the Brighouse/Rastrick Wards - which are the most affected by the plan!

Suggested Modifications:

Additional Evidence Link:

Comment ID **Lpp9**

Site ref (if applicable): **LP1451**

Person ID: **1116632** Name: **Mr Nicholas 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:

There is no objection to building new houses on this site if the local infrastructure was suitable. 1257 new houses would probably result in at least 2000 more cars. The area is already gridlocked. Getting in to Brighouse can already be a nightmare. The plan says there are two routes into Woodhouse Lane. Are you proposing that 2000 new cars come out into Woodhouse Lane via single track roads! Cars coming out of Shepherd Thorn Lane would use Woodhouse Lane as a rat run rather than try and exit into Huddersfield road which can be difficult with present traffic levels. How would you access the site to build these houses. Would the residents of Woodhouse Lane be subjected to Heavy Vehicle traffic for years. Where would the children go to school. Where would the residents go to the doctors. I have great difficulty getting a doctors appointment now. The only viable way to proceed with this plan would be to first build the infrastructure. If J25a off the M62 was built first, this could provide safe access to the site. It is also interesting to note that the owners of the site have recently expended a great deal of effort in clearing the site in order to grow grass, presumably because farmers are suffering a shortage of animal feedstock. What are you planning to deprive us of valuable agricultural land which may well be at a premium if we leave the EU. Unless the infrastructure issues are dealt with first then the plan has no merit whatsoever.

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

Duty to Co-operate Reason:

Suggested Modifications:

As previously stated, without the necessary infrastructure, the plan is a disaster for the area.

Additional Evidence Link:

Comment ID **Lpp909**

Site ref (if applicable): **LP1451**

Person ID: **1130340**

Name: **Mr P Chalker**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Recent consultation has been excessively brief, documentation wordy and difficult to understand "" particularly there is no mechanism to see changes from previous revisions. Core Strategy documentation relates to consultation from 10 years ago in 2008/9! In Brighouse only 17 people attended a workshop "" how can this be a current indication of people's views on the Local Plan when there are 3000 houses and an industrial park being proposed! The Plan Map is SIGNIFICANTLY MISLEADING when referring to sites LP1451/LP1463 - These show as 'REJECTED' and ARE NOT INCLUDED in 'New Housing'. This WILL DECEIVE people into believing no change is planned - Despite the fact the proposal is for OVER 3000 new houses in these two locations! They will not look for 'Garden Suburbs' which is meaningless to the public. The Sustainability Report contains arbitrary targets, and provides no evidence of need (Strategic Housing Assessment) within the Brighouse area. There are areas with missing targets and no indication that targets are meaningful and have been met before.

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

Sound Reason:

The scale of development proposed around the Brighouse area is not Sustainable and isn't justified within the plan. I can see no evidence (I'm unable to find any Strategic Housing Market Assessment Report) that indicates there is a sufficient need within the Brighouse area for such significant development. The Housing Stock Report included has no detail other than to show how many houses were sold in 2017! The Sustainability Appraisal has arbitrary targets listed "" such as reducing traffic impact on the environment by increasing Rail Journeys by 50%, 25% increase in bus journeys. Has the Council got a proven track record in meeting such - How did the Council SCORE against their UDP 2006 Section 9.3 Transport/Air Quality TARGETS? Reducing pollution, raising train travel 40%, limiting traffic growth and congestion etc. The Sustainability appraisal also has 'to be developed' against the 'Efficient Use Of Land' section. Similarly providing good employment for all "" is awaiting targets. How can the plan be regarded as sustainable if this hasn't already been measured objectively! All remaining greenbelt around Brighouse will be removed in this plan.

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

Duty to Co-operate Reason:

The provided Statement indicates discussions with neighbouring authorities have taken place, but fails to show any meaningful, proven and costed mitigations. Particularly in relation to transport, greenbelt and air quality. Remarkably the housing stock report shows less detail for Brighouse than other areas, yet it is to take the vast majority of new housing and commercial building within the plan! The CMBC Local Plan Working Party appears BIASED - NOT ONE of the 7 Members is from the Brighouse/Rastrick Wards - which are the most affected by the plan!

Suggested Modifications:

Additional Evidence Link:

Comment ID **Lpp91**

Site ref (if applicable): **LP1451**

Person ID: **1114219**

Name: **Mr Henryk Peterson**

Organisation:

Agent ID:

Name:

Organisation:

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 and Council's own evidence base state alteration of Green Belt boundaries should be fully evidenced and justified, should be based only on exceptional circumstances and should ensure permanence of boundaries in the long term. The distribution of proposed housing allocations in particular the proposed garden suburbs (LP 1451; LP 1463) involving a Green Belt boundary alteration, cannot be justified using a rationale of improving delivery of housing. There are more sustainable ways of achieving housing delivery without recourse to large scale release of Green Belt land. Alternatives e.g potential sites that adjoin settlements such as LPO951 off Stainland Road which has now been placed in Green Belt, could involve inclusion of allocations that better reflect settlement hierarchy, improve spatial distribution of new housing over the district, & better meet housing needs in a more sustainable way as well as ensuring greater certainty in future delivery of housing. Turley's Housing Technical Paper refers to Nathaniel Lichfield's 2016 report which states " But large scale sites are not a silver bullet. Their scale, complexity & (in some cases) up front infrastructure costs means they are not always easy to kick start. And once up and running there is a need to be realistic about how quickly they can deliver new homes. Past decades have seen too many large scale developments failing to deliver" Based on this critical assessment, the use of an exceptional circumstance argument that proposes alteration of the Green Belt boundary to achieve large scale allocations, appears unjustified. The "garden suburb" concept does not provide sufficient justification for alteration of the Green Belt boundary in these instances, as better alternatives for housing delivery exist. The land proposed as garden suburbs should therefore be retained in Green Belt.

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

Duty to Co-operate Reason:

Suggested Modifications:

Place the draft garden suburb allocation into Green Belt Alternative Green Belt sites, as were proposed in the Initial Draft Local Plan e.g land off Stainland Road, should be considered as housing allocations, with minor alteration of the Green Belt boundary. This would represent a more sustainable approach to the delivery of housing development. The suggested alternative was considered in the Green Belt Review (2016). The Review found such land did not fully meet Green Belt criteria. That exceptional circumstance existed to alter the Green Belt boundary providing as basis for the land's inclusion as a draft housing allocation. This draft allocation should be re-introduced on to the submission plan.

Additional Evidence Link:

Comment ID **Lpp916**

Site ref (if applicable): **LP1451**

Person ID: **960434** Name: **Mrs Amanda Williams** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

Very little communication with local residents re the intended planning. Clearly been given the impression from a drop in session attended that any concerns we had unfortunately would not change anything. The current area and roads cannot withstand such a development of this size - no communication of plans to highways etc to back up such an increase in population. It seems Green Belt Laws are meaningless and will be overturned with ease, to fit in with the Council's plans! This even contradicts the council's current policies re Green Belt land. Given the plans for Bradley via Kirklees council, where will the boundary be between these boroughs?

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

Sound Reason:

Why would Brighouse, that has small percentage of population in Calderdale, be planned as receiving 50% of the planned housing. This is a huge disproportion of the housing planned. Have you ever driven into, through, around Brighouse in rush hour?? I cannot believe you think our local roads can cope with a huge increase in vehicles. The town will come to a standstill. I have not seen / heard any plans re how Local Amenities and Infrastructure will be improved to cope with these planned houses, population, vehicles. Air quality and Noise Pollution will get worse. You can already hear all traffic from motorway in the area and are we not already missing air quality targets.

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

Duty to Co-operate Reason:

Has there been any engagement with neighbouring council? There will be no natural boundary between boroughs and both areas sprawling into one. No communication with locals. Process of objections/comments not easy or highlighted, online portal and wording difficult to understand for less informed and understanding residents.

Suggested Modifications:

Green Belt Land to be left alone as protected. Distribute housing allocations fairly across all areas in Calderdale.

Additional Evidence Link:

Comment ID **Lpp92**

Site ref (if applicable): **LP1451**

Person ID: **1114219** Name: **Mr Henryk Peterson** Organisation:

Agent ID: Name: Organisation:

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 and Council's own evidence base state alteration of Green Belt boundaries should be fully evidenced and justified, should be based only on exceptional circumstances and should ensure permanence of boundaries in the long term. The distribution of proposed housing allocations in particular the proposed garden suburbs (LP 1451; LP 1463) involving a Green Belt boundary alteration, cannot be justified using a rationale of improving delivery of housing. There are more sustainable ways of achieving housing delivery without recourse to large scale release of Green Belt land. Alternatives e.g potential sites that adjoin settlements such as LPO951 off Stainland Road which has now been placed in Green Belt, could involve inclusion of allocations that better reflect settlement hierarchy, improve spatial distribution of new housing over the district, & better meet housing needs in a more sustainable way as well as ensuring greater certainty in future delivery of housing. Turley's Housing Technical Paper refers to Nathaniel Lichfield's 2016 report which states " But large scale sites are not a silver bullet. Their scale, complexity & (in some cases) up front infrastructure costs means they are not always easy to kick start. And once up and running there is a need to be realistic about how quickly they can deliver new homes. Past decades have seen too many large scale developments failing to deliver" Based on this critical assessment, the use of an exceptional circumstance argument that proposes alteration of the Green Belt boundary to achieve large scale allocations, appears unjustified. The "garden suburb" concept does not provide sufficient justification for alteration of the Green Belt boundary in these instances, as better alternatives for housing delivery exist. The land proposed as garden suburbs should therefore be retained in Green Belt.

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

Duty to Co-operate Reason:

Suggested Modifications:

Place the draft garden suburb allocation into Green Belt Alternative Green Belt sites, as were proposed in the Initial Draft Local Plan e.g land off Stainland Road, should be considered as housing allocations, with minor alteration of the Green Belt boundary. This would represent a more sustainable approach to the delivery of housing development. The suggested alternative was considered in the Green Belt Review (2016). The Review found such land did not fully meet Green Belt criteria. That exceptional circumstance existed to alter the Green Belt boundary providing as basis for the lands inclusion as a draft housing allocation. This draft allocation should be re-introduced on to the submission plan.

Additional Evidence Link:

Comment ID **Lpp93**

Site ref (if applicable): **LP1451**

Person ID: **680755**

Name: **Mr Michael Ellis**

Organisation: **Director Wilson Ellis Ltd**

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:

Over the 10 year consultation period various plans have been put forward for consideration and assessment by the planners, following the site assessments we now have the most detailed review imaginable "The Local Plan". When any site is put forward for consideration for the local plan, the site is presented to Highways for assessment. Due to the large amount of houses on the sites under consideration for Rastrick, why hasn't a plan been put forward in this report showing how the road system is going to deal with the increased volume of traffic in Rastrick. The road infrastructure is as important as where the houses are going to be placed. LP 1257 and LP 1000 Woodhouse Lane have 1281 homes allocated to the 2 sites LP 1032 and LP 1033 Toothill Bank have 106 homes allocated to the 2 sites The current national average of cars per house at present in this area is; 1.5 cars per household which is expected to increase over the next 15 years (life of the plan) to over 2 cars per household. The proposed new site entrance for LP1451 is on Huddersfield Road before the motorway bridge at the start of the dual carriageway on the Brighthouse side. Sites LP1032 and LP1033 will access Huddersfield Road at Toothill Lane. If the inspector approves the presented Local Plan there will be an approximate increase level of use under the current calculation of daily vehicle usage of 160 cars a day x 2 (return journey) at the Toothill Lane junction and 1,920 cars a day x 2 entering Huddersfield Road from Woodhouse Lane the usage will increase as visitors and deliveries are not in the calculations put forward. So between the end of the dual carriageway and Toothill Lane there is going to be a increase in of traffic of around 2000 vehicles + making the journey out in the morning and 2000 + returning at night. The Toothill Lane junction with Huddersfield Road will need major alteration as will Huddersfield Road with a new junction to be formed with the Woodhouse Lane site, the 2 junctions will also only be a maximum 500 meters apart. Once you have negotiated the new junctions on Huddersfield Road you will then have Fixby roundabout to negotiate followed by the Sun Inn junction as that junction will also have a similar problem due to the amount of houses proposed around that junction. The question is how are the sites in Rastrick going to integrate with the present road system and houses, if there is a plan can it be made public for consultation with the sites, if there's no plan then the current proposed housing plan should be thrown out.

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 **Lpp935**

Site ref (if applicable): **LP1451**

Person ID: **1178274**

Name: **Mr Graeme Hirst**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The Sustainability Appraisal Report for the proposed site is not included in this version of the proposed plan and was conveniently hidden away in the previous draft plan, meaning that many respondents were

not even aware of its existence. I am a computer literate, professional person, who is used to using the internet for research purposes and yet I only came across the Sustainability Appraisal Report for the site by chance. Surely, the Sustainability Appraisal Report should sit alongside the Site Assessment Report, so that the two can be reviewed objectively together & an appropriate response formed. For this garden suburb site and other development sites in the plan, the Site Assessment Report is relatively easy to find on the Policies Map; however, the Sustainability Appraisal Report is not & so the public have not been given an adequate opportunity to critique it. The Council's Consultation Statement massively overemphasises the amount of community involvement that has taken place on the Local Plan and I think if you were to poll the residents of Calderdale, the overwhelming response would be that the community has been kept in the dark over the proposed plans. The council has seriously overemphasised its attempts at press releases & social media updates! Publicity about the Local Plan has mainly come from neighbourhood forums and our local MP. It has also been extremely difficult to navigate the council's website and find the supporting information, and that is for a computer literate person. Elderly people and other groups within the community have even less chance of gaining access to such information.

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

Sound Reason:

The current NPPF advises that the local plan must be 'positively prepared, justified, effective and consistent with national policy'. I strongly feel that the current plan fails to be positively prepared or effective, as it is clear that many important concerns that have been raised by the public/community over the years have failed to be addressed by the council. These include the concerns relating to the serious lack of infrastructure to support the proposed development, the impact on highways, the loss of greenbelt and the contribution to air pollution issues in Brighouse. It seems like the council are simply 'going through the motions' and are failing to take on board or come up with any mitigation plans to any of the concerns raised. In its Sustainability Appraisal of the Local Plan 2018, the Council acknowledges that this proposed garden suburb will hugely impact the greenbelt and traffic situation in Brighouse "" this is clearly NOT a justified reason for the development to proceed. The individual Sustainability Assessment Report for this garden suburb site suggests there is only ONE positive outcome of the SEVENTEEN objectives, with 15 uncertain outcomes and one negative outcome. Surely, this cannot be a justified reason to put this site forward for development?! Finally"!";"!";". In my previous response to the Local Plan, I detailed how the proposed development is not consistent with national policy, which in turn means the plan cannot be considered 'legally sound'. These inconsistencies are detailed as follows: Paragraph 31 of the National Planning Policy Framework states that: "Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development, including large scale facilities such as rail freight interchanges, roadside facilities for motorists or transport investment necessary to support strategies for the growth of ports, airports or other major generators of travel demand in their areas." THE TRAFFIC PROBLEM IN BRIGHOUSE IS UNDENIABLE.....unless you are either a recluse who never leaves the house or someone who commutes by helicopter. The whole town is virtually stationary at rush hour & is gridlocked whenever an accident occurs on M62 or surrounding major roadways. I am told that traffic assessments have been carried out and no real concerns were raised - I would strongly question the validity of this conclusion and ask that more 'independent' surveys are carried out. The addition of another 1257 dwellings, along with the other 'Garden Suburb' at Clifton & the other smaller developments proposed for Brighouse is extremely alarming in terms of the impact on Highways. Around 6000 new dwellings in Brighouse will lead to a massive increase in the number of cars / road users associated with such development, which will push an already overstretched highway system to breaking point. Birds Royd Lane is one of the main roads leading to / from this development & is in a terrible state of repair, with numerous large potholes & exposed cobbles along its entirety. Surely, an access route to a large housing development through a poorly maintained industrial estate is not good planning? I have seen no information in the Local Plan which addresses the

issue of highways / road infrastructure or the travel demands of the Brighouse area. I am extremely concerned that should this development go ahead, the impact on highways will be detrimental to the whole of Brighouse, it's residents & road users. In turn, this will negatively impact local businesses, damaging the local economy. Adequate infrastructure needs to be considered, consulted on & properly planned, prior to this development taking place. The National Planning Policy Framework document states that: The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. Green Belt serves five purposes: 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; to preserve the setting and special character of historic towns; and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Should this development (along with the garden suburb at Highmoor Lane) go ahead, our precious and dwindling greenbelt land surrounding the Brighouse area will be IRREVERSIBLY damaged. It appears that the council's planners have glanced at the maps of Brighouse, identified some large green, open space areas (regardless of their greenbelt status) and considered them as suitable sites, without considering their importance in relation to the points listed above. Along with the similar large housing & commercial developments proposed by Kirklees council, it is clear that our green belt is massively under threat and we should do everything we can to preserve it. Green belt serves to provide areas of recreation for people of all ages and abilities including walkers, runners, cyclists & others wanting to enjoy the countryside in their local area. It is a vitally important leisure / recreation resource, which should not be underestimated & serves to enhance people's health and well being. Not to mention it is home to a huge range of plants & animals, which add to the richness of our local environment. Finally, as stated in the list above, our greenbelt serves to check unrestricted sprawl of urban areas & prevent neighbouring towns merging into one another. This development, along with the developments planned in Kirkless, will effectively see the two towns of Brighouse and Huddersfield merging together. One of the National Planning Policy Framework's 12 core principles is set out as follows: "Support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources" More specifically in terms of flooding, it also states that: "When determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere" The proposed development at Woodhouse Lane, clearly does not take into consideration the increased flood risk caused by building large housing developments on green belt land, so close to the River Calder. Brighouse suffered terribly in the Boxing Day floods of 2015 and it is simply common sense that more development will in turn create more surface run off, less infiltration & attenuation of rain water and therefore increased river levels & flooding. Bradley Park Dike (a stream) drains from this site, underneath the railway line & into the River Calder & this particular stream is at maximum capacity during periods of high rainfall. What will happen if 1200+ new homes are built around it? It seems fairly obvious to me & I'm no expert in flooding. Whilst flood risk assessments will no doubt be required and 'mitigation' measures recommended, nothing can substitute the value of retaining our open spaces as part of the flood risk strategy.

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

Duty to Co-operate Reason:

I am very sceptical about the actual level of co-operation between Calderdale Council and the neighbouring Local Authorities of Kirklees and Bradford. The Duty to Co-Operate Statement produced by Calderdale Council has some vague outcomes of meetings between the authorities which include the following: 'SE Calderdale /N Huddersfield Delivery Plan Scoping Report/Cross boundary working "' DISCUSSIONS ONGOING' 'Cross boundary planning issues - DISCUSSIONS ONGOING' Other outcomes of meetings between the authorities include the following: 'Both authorities to continue monitoring issues

discussed and pursue statement of common ground' 'Both authorities to continue monitoring issues discussed to determine if any joint working required' In my opinion, continued monitoring and 'discussions ongoing' is simply not acceptable evidence of the Council's compliance with their 'Duty to Co-Operate'. The proposed plans for Brighouse will change the shape of Brighouse forever and so Calderdale Council must have a coherent local plan, that has been fully appraised and co-ordinated with its neighbouring Local Authorities and their development plans. A perfect example of where this has not happened is the massive housing development proposed at Bradley Golf Course, which is adjacent to the garden suburb at Woodhouse and so will have a huge impact on traffic, pollution, greenbelt etc and it appears this has been overlooked.

Suggested Modifications:

Alternative sites must be explored and more priority given to Brownfield sites across the borough of Calderdale. Much more infrastructure is required to support this garden suburb, and a plan for this must be in place prior to the garden suburb plans being approved. If development on this plot of land has to go ahead, a much smaller development would be more appropriate and have more public support, as it would have less impact on the greenbelt, flooding, traffic/highways, air pollution.

Additional Evidence Link:

Comment ID **Lpp936**

Site ref (if applicable): **LP1451**

Person ID: **1139240**

Name: **Mrs Krystina Benton**

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?: **No**

Sound Reason:

Disproportionate Allocation I strongly oppose and would like to question the Council's decision to allocate just under half of Calderdale's plans for new dwellings in Brighouse and Rastrick. That is approx' 4,500 of the total 9,500 houses in Calderdale's Local Plan. The 2 Garden Suburbs at Woodhouse (Rastrick) and Clifton (Brighouse) consisting of 3000+ houses equate to a third of the total houses in the Local Plan. (These 2 areas being 2 of the most expensive for property in the area) Surely the idea of the Local Plan is to spread housing and employment across the borough. There is also no evidence of concrete plans for roads, new leisure facilities schools medical facilities etc' to support the Garden Suburbs in the details. Air Pollution I am of the understanding that Calderdale already performs badly being ranked 122 out of 149 local authorities. I understand Brighouse has had a marginal decrease. With the new Garden Suburb at Woodhouse and the new housing in Bradley (Kirklees) the extra vehicles that will be using the already local congested roads can only worsen air pollution in our area. Infrastructure. What are the Council's plans for Health Facilities in the area? The Doctors and Dental surgeries are already oversubscribed. What plans for new Leisure Facilities? Youth Services etc' The Council has a duty for the Health and Lifestyle of its residents. Greenbelt. I question why the Council feels it necessary to develop so much the Green Belt in our area. They should be looking at developing more Brownfield sites in the Borough first I am aware these are more costly to developers but there should be more of these included. I am of the understanding that The CIL set by the Council for our area is £40 but Hebden Bridge has a CIL of £85. Why? Is this to make it

more appealing to developers? With the infrastructure required in our area alone this does seem low.

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

Duty to Co-operate Reason:

How much discussion has taken place with Kirklees Council with regards to the huge amount of houses being built in such close proximity. ie Calderdale Woodhouse Garden Suburb and the houses in Kirklees at Bradley Park With regards to increased traffic congestion etc'. There is much talk in the Local Plan's of a new Motorway (M62) junction(24a) at the present time there is no funding available for this.

Suggested Modifications:

Additional Evidence Link:

Comment ID **Lpp942**

Site ref (if applicable): **LP1451**

Person ID: **1139240**

Name: **Mrs Krystina Benton**

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:

Disproportionate Allocation Unfair distribution of allocation for Brighouse/Rastrick almost half of the total houses in the Local Plan. I read in one of the earlier comments when the Council gave the brief to the planners they were told to give a large proportion of the development to Brighouse/Rastrick. Should the Council have been telling the planners where the developments should be?

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 **Lpp952**

Site ref (if applicable): **LP1451**

Person ID: **1139240**

Name: **Mrs Krystina Benton**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Given the large development in the area I am not convinced the Local Council has done enough to ensure residents are aware of the impact this will have.

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

Sound Reason:

The Brighouse and Rastrick areas are taking a large proportion of the Calderdale Local Plan. Of the total 9500 houses in the borough 4500 are to be built in Brighouse/Rastrick in effect just under 50%. How can the Council justify this? The concept of the Local Plan is to provide housing needs ACROSS the borough for future generations. This does not appear to be the case in the Calderdale Local Plan. In the local press we read about the Regeneration of Halifax the New Roads, Train Station, Leisure Centre and Borough Market. What do the Council intend to do in Brighouse with regards to our Train Station car park which is full by 8am what new Leisure Facilities will there be in Brighouse to accommodate the increase in population? The infrastructure has not been properly addressed what plans have the Council for Health services the Doctors and Dentists in the area are already oversubscribed. IS there going to be any provision for Youth Services ,Libraries, Nurseries etc' along with Leisure Facilities to meet the needs of the increased population. For which the Council has a duty to support healthy lifestyle and well being needs. The Air Pollution in the area will increase with the new developments with the increased traffic. Our local environment will suffer greatly from the loss of Green belt. An extract from :Strategic Vision for South East Calderdale" The balance of evidence indicates that Brighouse and Rastrick will be the key focal points for new residential development. This is due to the availability of land and their relative sustainability, with fewer potential impacts on the important environmental designations in the west of the District. Brighouse as a town is also likely to benefit from capacity improvements to the A641, A644 and potentially also a new M62 junction 24a which could all be delivered through the West Yorkshire + Transport Fund. Regarding the M62 junction 24a there is no funding at present. So when would this funding become available and what is the probability of it actually taking place? The impact of traffic congestion in our area is a huge concern now without the development. To imply roads could be built isn't good enough. Brighouse because of its proximity to the M62 will in part become a sleeper town for Leeds and Manchester.

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

Duty to Co-operate Reason:

Not enough consultation between Calderdale and Kirklees. Bradley Park Development

Suggested Modifications:

Additional Evidence Link:

Main Issues and Council Response

Legal Compliance

Main Issues:

1. There has been no/little opportunity to comment on the Woodhouse garden suburb.
2. The Council did not reply to Regulation 18 comments which is not procedurally correct and

demonstrates a failure to consult with the local community.

3. Inadequate involvement of the public in the plan making process.

4. Format of consultation was not effective and prevents older members of society from commenting.

5. Every household in the District should be written to regarding the Local Plan.

6. The Plan is not consistent with National policy and legislation.

7. Sustainability Appraisal is inadequate to justify garden suburb strategy.

8. Calderdale is failing to meet environmental targets.

9. CIL has been set deliberately low to attract contractors; this in turn has reduced the possibilities of generating the necessary funding for required infrastructure.

10. Key local communications regarding this development have all been conducted by the residents of Woodhouse through the form of letterbox flyers and private local meetings which given the scale of development is unacceptable.

11. The inequitable spread and concentration of allocations risks putting Calderdale in breach of its duty under the Climate Change Act.

12. The consultation process has been rushed.

13. Sustainability Appraisal was not available for comment.

14. There is no mechanism to see changes from previous versions of the Local Plan.

15. The Local Plan Policies map is significantly misleading in that the Garden Suburbs show only as Garden Suburbs but not housing sites.

Council's Response:

1. - 5. 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). (SD04.1/SD04.2)

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.

6. The revised NPPF (July 2018) establishes that the policies in the previous Framework will apply for the purpose of examining plans, where those plans are submitted on or before 24 January 2019

With the exception of the Local Housing Needs calculation the Local Plan is prepared under the provisions of NPPF 2012.

The Council has prepared the Plan in accordance with NPPF 2012 because the revised NPPF with its transitional arrangements was not published until July 2018, after the Council took the formal decision in June 2018 to publish the Plan in August.

The Council has carefully considered the merits of submitting before or after 24 January, and concluded that delaying submission presents more policy tensions on account of the fact that the greater part of the

Plan has been predicated on the NPPF 2012.

7. The SA (SD03.1/SD03.2) 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. - The justification for the garden suburbs is detailed in Evidence Document EV40 – Justification for the Garden Suburbs (2018).

8. There is no justification of this assertion.

9. In setting the levy rates, Calderdale Council considers it has struck an appropriate balance between;

- a. the desirability of funding from CIL in whole or in part the actual and estimated total cost of infrastructure required to support the development of its area, taking into account other actual and expected sources of funding, and
- b. the potential effects, taken as a whole, of the imposition of CIL on the economic viability of development across the Calderdale District.

10. 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). (SD04.1/SD04.2)

In accordance with Policy IM7, the production of a master plan for strategic housing sites should involve all relevant stakeholders, including the Council, infrastructure providers, landowners, developers, the local community, service providers and other interested parties. Master plans should be developed in consultation with the Council prior to the submission of a planning application.

11. The Council acknowledges the significance of Climate Change and points to the policies in the Local Plan (SD01.1) on EN2 (Air Quality), IM4 (Sustainable Travel) and the policies in Section 12 on Health and Wellbeing to assist in addressing issues related to Climate Change. The larger allocations and in particular the two Garden Suburbs provide an opportunity to incorporate a more sustainable approach towards development including accessibility and active modes of travel as exemplified in Policy IM7 (Master Planning of Housing Sites).

12. 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). (SD04.1/SD04.2)

13. The Council considers that the supporting text contained within the Sustainability Appraisal(SD03.1/SD3.2) adequately explains the approach utilised. The purpose of the SA is to inform the plan preparation process by appraising the Local Plan's Objectives, Policies, and Allocations in relation to their sustainability, establishing their likely impacts, cumulative impacts, and the scope for mitigating any possible negative impacts. As the scoping report had been consulted upon the results are evidence which does not require consultation.

14. The Regulation 18 Consultation 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.

15. The Garden Suburbs have been identified as such, rather than New Housing Allocations, as they provide an opportunity to provide a planned 'garden village' layout with enhanced local facilities and infrastructure.

Test of Soundness

Main Issues:

Green Belt

1. Development would undermine purposes of including land in the Green Belt and is contrary to Green Belt policy. Lack of exceptional circumstances. Need to retain and protect the Green Belt gap between Calderdale and Kirklees. Green Belt Assessment is incorrect. Utilise brownfield sites first.
2. Disproportionate impact across the Borough.
3. Development would constitute urban sprawl and would result in the merging of towns, ribbon development and loss of openness.
4. Benefits of scheme will not outweigh the harm done to the Green Belt.
5. The existing Greenbelt forms a defensible boundary.
6. No site by site analysis of green belt release to measure the scale of impact of garden suburbs.
7. The evidence provided to release green belt land at the Woodhouse site (LP1451) for a garden suburb is not robust, credible or justified.
8. High proportion of development on greenfield land will have detrimental effect on local environment.

Site Access

9. The Council has not shown how site access and egress can be achieved.
10. Access from Firth House Lane and Ryecroft Lane is unacceptable.
11. Access is not suitable for large vehicles.

Availability

12. There are at least 11 different landowners with only one having a development agreement in place.

Air Quality

13. The proposed development would have a negative impact on air pollution and the Brighouse Air Quality Management Area.

Pollution

14. Impact on air, noise, light and water pollution, and increase in littering and fly tipping.

Local Road Network

15. Inadequate local road network, specifically congestion and on-street parking, giving rise to safety issues. Woodhouse Lane, Birds Royd Lane, Daisy Road, A641, A6107 and Brighouse Town Centre are specifically mentioned.
16. Proposed improvements to local road network are inadequate.
17. The Local Plan contravenes Paragraph 109 of the NPPF.

18. Assessment of road capacity cannot be accurately assessed without including impact of Kirklees development.

19. Recent traffic survey was carried out during holiday period and is not accurate.

20. Development of site will potentially give rise to 15,000 extra car journeys per day.

21. Inadequate Traffic modelling.

22. The required modal shift in transport modes will not take place.

23. These sites have been selected on the basis of proximity to transport routes alone which is not adequate justification.

Strategic Road Network

24. Development in this location is premature without confirmation of regional infrastructure plans.

25. Development on this scale in this location will impact negatively on the strategic road network, specifically the M62.

26. The plan seems dependent on the proposed motorway junction (24a) which may not be delivered. Development of this site is premature without this.

27. Difficult to make informed comments with uncertainty over proposed Junction (24a) on M62.

Infrastructure

28. Lack of/pressure on existing amenities, services and facilities in the local area, e.g. schools, shops, doctors, and sewerage systems. The proposed allocation of land for a new primary school is less than the minimum legal requirement.

29. Insufficient information provided about the infrastructure requirements of this development and other nearby developments.

30. No evidence that infrastructure will be in place before development.

31. Developer contributions may not cover infrastructure provision.

32. Inadequate Infrastructure Planning.

33. There is no evidence to confirm the garden suburbs will be self contained.

34. CIL has been set deliberately low to attract contractors; this in turn has reduced the possibilities of generating the necessary funding for required infrastructure.

Heritage

35. The HIA has not been reflected in the developable area.

36. The HIA is inadequate.

37. The Heritage Impact Assessment indicates that Firth House Lane should be protected in its current form.

38. Heritage assets and landscape character will be significantly harmed by development.

39. The vision for site would harm setting of heritage assets and is not sound or deliverable.

40. As currently worded, the Site Specific Consideration in so far as it relates to the historic environment is Unsound as it is not likely to be effective.

Ecology

41. Impact on wildlife. The ecological assessment is inadequate. A bat survey has not been completed. Buffer zones required by Natural England have not been reflected in the developable area. A Protected Species Report has not been prepared, which should be done prior to allocation. Development will impact on ancient woodland and woodland generally.

42. The loss of such a large area to development will have significant impacts on ecology which could not be outweighed by the proposed mitigation strategies.

Open Space

43. This development will result in a loss of open space and areas for walking.

44. Garden suburb is inappropriate approach for Brighthouse as it removes most of the existing Green Space.

45. The site assessment report wrongly states that there will be no loss/no impact in relation to the loss of open space.

46. There will be a loss of footpaths.

47. Opportunities for outdoor sport and outdoor recreation near urban areas will be reduced or removed.

Flooding and Water Management

48. Building on greenfield land will increase flooding in the local area.

49. Site currently plays an important role in Flood Risk protection.

50. Insufficient and vague information provided on drainage.

51. Evidence of flooding events locally.

52. Results of flooding and drainage assessments are not available to public which prevents well informed comments being made.

53. Waste water management is not dealt with in the plan.

54. The site is located in an Indicative Critical Drainage Area in the SFRA.

55. The SFRA confirms that the whole of the site is within an area susceptible to groundwater flooding/groundwater emergence (50 - <75%). As such a SFRA Level 2 assessment should have been completed.

Deliverability

56. The start date and delivery timescales are inflated and unrealistic with an unsustainable growth strategy focusing on the South East of the District.
57. Private land required for development to be delivered giving rise to possible complications with scheme layout and design.
58. There are discrepancies in the developable area, housing numbers and densities proposed.
59. Over-reliance on the Garden Suburbs to deliver housing numbers.
60. The Council's Objectively Assessed Need (OAN) is too low.
61. Housing figures are set too high as recent household projections confirm that housing need will fall significantly.
62. Phasing of development as medium term is unrealistic.
63. The Council has not considered the housing type mix on this site and more widely across the district.
64. No comprehensive masterplan is included in the Local Plan. Inclusion of this ensures that different parts of the site can be delivered cohesively and optimise site yield.
65. Development is potentially unviable unless affordable housing policies are ignored and an almost zero CIL rate is applied.

Health and Wellbeing

66. Development of site would have a huge impact on sense of place, identity and wellbeing.

Other

67. Land is unfit to build on as no solid foundation.
68. No clear definition of the council's intentions for these sites.
69. These sites have not been shown as a housing growth area in the SEP, so do not conform with the Government's Garden Community Prospectus.
70. There is no evidence as to how these sites fulfil requirement of NPPF with regards to focusing development on locations which are/can be made sustainable in terms of transport.
71. The SE Calderdale Strategic Vision is inadequate, misleading and does not provide sufficient technical detail.
72. Development of the site is not sustainable (unsustainable growth strategy).
73. Terminology of Garden Suburb should not be used - the site is not a self contained community and is nothing more than a bolt on housing estate.
74. The garden suburb sites were originally identified as urban extensions but have subsequently been

rebadged as Garden Suburbs. There has been no indication of the reasoning behind changing this and how they are considered different now.

75. Government guidance on garden communities has not been followed in terms of demonstrating no significant impact on the surrounding area.

76. Inadequate evidence provided for a site this size.

77. Development of this site will give rise to a loss of high quality agricultural land and will impact local food production.

78. Development will consist of larger more expensive houses which will attract commuters not local people.

79. Development will be low density and will not be an efficient use of land.

80. Disproportionately high level of development allocated to Brighouse and Rastrick compared to rest of Calderdale. Halifax is the principal town and should take the highest level of development.

81. Significant approved development over the nearby Kirklees boundary very close to site LP1451.

82. No evidence demonstrated by Council that the cumulative impact of development in the area has been taken into consideration.

83. Surveys done by the Council seem to be years out of date.

84. The decision to build in Rastrick is political, not sound.

85. Development of this site is contrary to the aims and objectives of the Local Plan.

86. The Council have not provided evidence to show how the suburbs fulfil the requirements of NPPF 2018 para 103.

87. This allocation should also include employment uses.

88. The Local Plan has not been positively prepared and will not be effective.

89. Sustainability appraisal does not adequately assess the holistic sustainability of individual sites.

90. All of the development proposed in South East Calderdale and on or near the Kirklees border will have a cumulative negative impact.

91. Major housing development in this location will only serve those working in Kirklees, Leeds, Bradford and Manchester.

Council's Response:

1 – 8

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. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the Council has examined fully all other reasonable options for meeting its identified need for development

Using the same methodology as the Green Belt Review, proposed development sites in the Local Plan that are located in the Green Belt have been assessed against the Green Belt purposes in the NPPF using the boundaries of the site itself. During that assessment, a series of questions were asked in order to test whether development of the site would lead to the coalescence of towns and unrestricted urban sprawl, along with questions relating to ribbon development and encroachment.

In terms of comments relating to the distribution of development, 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.

As part of the methodology, questions were asked as to whether there is a robust, permanent Green Belt / development boundary and whether natural features and infrastructure provide a good physical barrier or boundary to the site that would ensure that development was contained. Where sites have been proposed in the Green Belt, a site specific consideration will ensure the creation of a strong and defensible boundary between the allocation for housing and the Green Belt.

9. - 11.

Site access is achievable and it appears three access points are possible. CMBC Highways Development Management Officers have requested a masterplan for the whole site to include a Transport Assessment to demonstrate the access points to the site and mitigation of the increase traffic impact. ID Planning are working on behalf of the land owners to submit all the relevant studies to demonstrate the suitability of this site including a masterplan and transport assessment are available in the Examination Library under SS35-LP1451.

12. 'Statements of Common Ground' (CC07) and 'Memorandum of Understandings' have been drafted between Land Owners, Agent and the Council which demonstrates the availability and agreement to deliver this site.

13./14.

The Environmental Health Section of the Council has identified potential noise from the motorway as an issue, as well as land contamination, non mains drainage and the impact on the Brighouse Air Quality Management Area. The area at Toothill is currently being monitored for traffic pollution and may be declared an Air Quality Management Area. Any development will need to take all these issues into account and propose mitigation where necessary. These Site Specific Considerations have been reflected in SD01.2 Site Allocations Supporting Information.

14. Policy BT5 Designing Out crime ensures schemes include measure which will reduce opportunities for antisocial behaviour.

15. /16.

The highway authority recognises that mitigating improvements will be required. Transport Assessments

would be required to accompany any planning applications; these would need to demonstrate that the proposals would not have a severe traffic impact. Road Safety would be assessed as part of the site masterplanning.

EV 54.9 Technical note 8: Strategic Vision for South East Calderdale states that the modelling work set out in the report demonstrates that the existing network is presently operating satisfactorily but with some key junctions that have insufficient capacity which result in queuing and delays on critical parts of the network. The Garden Suburbs will result some more onerous impacts by the end of the local plan period. However, it is reasonable to expect that the highways infrastructure improvements coming forward will mitigate this impact.

These highways improvements are set out in the Infrastructure Delivery Plan. The IDP has been updated to include a table setting out the Local Plan housing trajectory and the provision of critical infrastructure. This table shows the cumulative trajectory; the individual infrastructure projects that need to be delivered by that point in time; funding status; regulatory status; construction status and lead agency/partners.

17. Paragraph 109 refers to the 2019 NPPF, however the equivalent is within paragraph 32 of the 2012 NPPF. The Local Plan is supported by Technical Reports (EV54.1 – EV54.13 produced by WSP Consultants and a Statement of Common Ground (CC03/CC03a) between the Council and Highways England which have demonstrated that there are no grounds to prevent development of LP1451 based on highways.

18. Cumulative impact of development from Kirklees is assessed in EV54.10 Technical Note 9 – Assessment of Cumulative Impact and EV54.12 Technical Note 11 – Cross Boundary Impacts.

19. – 22.

The SATURN model used a worst case scenario using the most up to date knowledge at the time. EV 54.9 Technical Note 8 – Strategic Vision for South East Calderdale demonstrates that the network operates in a reasonable satisfactory manner in the base situation although there are some issues with capacity at peak times. The forecast situation takes account of some local highway improvements being implemented and the Local Plan housing allocations being built with the resulting impacts not being particularly onerous. Mitigation measures associated with the masterplans could fully mitigate the impact of the two sites.

23. EV51.1 Site Allocations Assessment Methodology sets out the method undertaken to select sites which is based on a number of factors, one of which is proximity to transport routes.

24. - 27.

There are likely to be impacts on the Strategic Road Network as a result of developing this site. Highways England has suggested that this site may need to deliver or contribute to the additional schemes identified by the Highways England West Yorkshire Infrastructure Study and included in the Infrastructure Delivery Plan (EV42.1). It is also suggested that development of this site not be commenced until later in the Plan period.

West Yorkshire Infrastructure Study identifies further capacity enhancement needed 2022 and 2030.

The Local Plan is not predicated on the delivery of Junction 24A. The intervention is not a critical to the delivery of the growth scenarios proposed in the Local Plan.

28. - 30.

The Local Plan is supported by the Infrastructure Development Plan (EV42.1) which sets out the

infrastructure requirements resulting from the growth proposed in the borough. The IDP has been updated to include a table setting out the Local Plan housing trajectory and the provision of critical infrastructure. This table shows the cumulative trajectory; the individual infrastructure projects that need to be delivered by that point in time; funding status; regulatory status; construction status and lead agency/partners. The Primary School space standards will be assessed at application stage.

31. The CIL will help to deliver the Calderdale Local Plan (and Site Allocations Plan once adopted) by bringing in funding for infrastructure to support new growth. It is set at rates which are considered will not deter the development and growth as set out in the Local Plan, or impact on affordable housing provision.

32. The IDP sets out the infrastructure required to support the level of development that is proposed in the Local Plan.

33. Brighouse is towards the heart of the West Yorkshire conurbation. With appropriate design, layout and place-shaping the Garden Suburbs will provide sustainable homes for people desiring to live towards the heart of the conurbation. The master planning of the areas will support the development of sustainable places.

The garden suburbs have not been proposed as part of the Government's Garden Communities Programme. The programme was announced following the Council's decision to adopt the garden suburb approach to distribution of development.

The vast majority of housing and employment opportunities in the Borough are already in existence. The Local Plan assumes that there is some movement between homes and work places and plans. In SE Calderdale the proximity of the Enterprise Zone with the Garden suburbs shows that proximity is important to help manage growth.

34. In setting the levy rates, Calderdale Council considers it has struck an appropriate balance between;

- the desirability of funding from CIL in whole or in part the actual and estimated total cost of infrastructure required to support the development of its area, taking into account other actual and expected sources of funding, and
- the potential effects, taken as a whole, of the imposition of CIL on the economic viability of development across the Calderdale District.

35. The developable area does reflect the HIA. And the Council would expect any application to consider the recommendations provided within the HIA.

36. The Heritage Impact Assessments have been prepared with reference to the assessment methodology provided in Historic England's Advice Note 3: The Historic Environment and Site Allocations in Local Plans (2015); Good Practice Advice in Planning 2: Managing Significance in Decision-Taking in the Historic Environment (2015); and Good Practice Advice in Planning 3: The Setting of Heritage Assets (2015).

37. -39.

There is a group of Listed buildings at Firth House lies within an open rural landscape, likely to have remained relatively unchanged, and therefore greatly contributing to their historic setting and enhancing the buildings significance. There is also Grade II Listed Anchor Pit Lock to the east of the site, a Class III Archaeological Site (PRN 2675) within the site and The Gatehouse on Huddersfield Road which is undesignated. The Heritage Impact Assessment sets out the potential harm and has identified where mitigation can be implemented to negate this harm. The HIA also recommends a detailed masterplan

addressing the points raised in the HIA. One of the main recommendations is to remove from the developable area a buffer around the Listed Buildings of Firth House.

40. The purpose of the Heritage Impact Assessment (HIA) is to inform the site allocation process of the Local Plan. Through assessment of the significance of the historic environment, the likely impact of allocation on affected heritage assets, both designated and non-designated, is identified and consideration given to whether such impact can be mitigated.

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.

41. – 42.

Bradley Park Dike forms the site's southern boundary. Bradley Wood, an ancient woodland site is on the other side of the dike. West Yorkshire Ecology has recommended that in order to mitigate against negative impacts, a 20m stand-off from Bradley Wood and a 10m stand-off from the dike is applied. The development should also ensure that it makes provision for biodiverse recreational space to reduce pressure on Bradley Wood. A small area of species-rich semi-improved grassland in the centre of the site and a short section of disused railway to the north-east fall within the wildlife habitat network, and these should also be excluded from the developable area. The Council's Conservation Section (Ecology) states that any proposal needs to demonstrate that there would be no adverse ecological impact on the identified ecology. As well as the buffers and biodiverse recreational space, the Conservation Section have recommended that SuDS should take account of existing biodiversity and take the form of fen, marsh, wet woodland, wet grassland or standing water in basins. Biodiversity mitigation/enhancement should provide locally native species rich unimproved grassland and locally native species rich hedgerows, restoring gaps in the Wildlife Habitat Network. Also, prior to the production of a masterplan, an Ecological Appraisal should be produced including the results of initial ecological surveys (such as Phase 1 habitat and protected species surveys) and an ecological record search with West Yorkshire Ecology to identify constraints, highlight opportunities for ecological enhancement and make recommendations for design and allow significant adverse ecological effects to be avoided or minimised wherever possible. After the master plan is produced, an Ecological Impact Assessment and Ecological Management Plan will be required which comply with CIEEM guidance.

Numerous ecological reports have been undertaken to support the allocation and are in the Examination Library under SS35-LP1451.

43. – 47.

Development would result in no loss of designated Open Space, it 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. Due to the scale of this site, there is scope to provide open space within the development which needs discussion as the development is progressed. The visual impact of any development should be considered and the safeguarding of the public right of way. The developing masterplan includes provision for open space and will have to accord to Local Plan Policy IM7

48. – 55.

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 considers the site suitable for development subject to capacity building of existing

drainage network and well planned site investigations. Topography and water features that affect the layout of the development will also need to be considered. It is recommended that SuDS are included to mitigate the potential for increased surface water flooding.

The NPPF makes it clear that 'inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere'. Supported by the Calder Catchment Strategic Flood Risk Assessment 2016 (SFRA), the Local Plan is focused upon managing flood risk from all sources and applying a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change.

ARP Associates – Chartered Consulting Engineers have undertaken a drainage assessment of the site (SS35 LP1451 – Drainage Assessment in the Examination Library). It concludes that with compliance to the mitigation set out in the report, the proposed development can satisfy the requirements of the NPPF and PPG in relation to flood risk and surface water drainage strategies.

53. The Local Plan is supported by the Infrastructure Development Plan which sets out the infrastructure requirements resulting from the growth proposed in the borough.

The IDP has been updated to include a table setting out the Local Plan housing trajectory and the provision of critical infrastructure. This table shows the cumulative trajectory; the individual infrastructure projects that need to be delivered by that point in time; funding status; regulatory status; construction status and lead agency/partners.

56. The Sustainability Appraisal (SD03.2) has assessed the Garden Suburb Approach and the “Pepper Potting” approach of sites around the district and found that the Garden Suburb Approach would provide the best opportunity to ensure high quality design, reduce the risk of impact on international and national areas of protection and conservation, increase the accessibility to services including public transport, health and education, as well as access to employment opportunities. The revised start date and delivery times of the garden suburbs are set out in the SoCG (CC07) between the Council and ID Planning.

57. A Memorandum of Understanding has been signed by all owners and states “the parties shall work together to achieve the principal objective within reasonable timescales and with a view bearing a reasonable in scale and kind proportion of the infrastructure costs between the respective owners of the site to ensure delivery of 1,257 houses within the plan period.”

58. These discrepancies have come from a number of iterations of an indicative masterplan. The final developable area, housing numbers and densities proposed will be established during the Examination Hearings through representations submitted by ID Planning and the Council.

59. The Council have a range of sites in the Local Plan to deliver the required housing. There is a mix of small, medium and large sites in both private and public ownership. The Housing Technical Paper (EV33) sets out how these sites will be delivered in the Plan period.

60. / 61.

The Standard Methodology used in the Publication Draft Local Plan to set the housing figure uses the relevant population projections as set out in the NPPF/PPG.

62. The SoCG (CC07) between the Council and ID Planning sets out a revised phasing of delivery which brings forward Phase 1 for circa 200 dwellings early in the Plan period.

63. The housing type and mix will be established at planning application stage in line with the housing policies in the Local Plan. Housing type and mix has been considered more broadly across the district in the Housing Technical Paper 2018 (EV33) and the SHMA (2018) (EV36) which inform the Plan preparation.

64. Policy IM7 of the Local Plan sets out that Master Planning is required for all strategic housing sites with a capacity for 500 or more dwellings. The allocation is supported by a 'Strategic Vision for South East Calderdale' and indicative masterplan. (See SS35-LP1451 in the Examination Library)

65. There has been no evidence to suggest the site is unviable. Both the Viability Study undertaken by the Council and a detailed viability assessment prepared by ID Planning demonstrates the site is viable to deliver the requisite number of dwellings and associated infrastructure.

66. Development of this site will have to be in line with Local Plan Policy 'HW3 – Well Being', 'BT1 – High quality, inclusive design', and 'GN4 – Landscape Character'.

67. There has been no evidence provided which substantiates the claim that the land is unstable. Where land stability issues do arise a planning application will have to be accompanied by a land stability assessment and mitigation measures. The Preliminary Geoenvironmental Investigation (SS35-LP1451) concludes that the site is suitable for allocation subject to further investigation and appropriate mitigation.

68. / 69. / 73.

The intentions of the "Garden Suburbs" have been set out in the Vision, Planning for Growth and Masterplan Policy sections of the Local Plan; as well as the 'Strategic Vision for South East Calderdale' (EV39). Although the site is not part of the Government's Garden Community Prospectus the principles of "garden cities" have been used to great effect to ensure enhanced local facilities and infrastructure, quality of design contribute to the sustainable development of these sites.

70. The large scale developments of the Garden Suburbs in Brighouse and that in Bradley, Huddersfield are part of an ongoing spatial consideration of growth within the Leeds City Region. The large sums being allocated by the West Yorkshire Combined Authority to the A641 Corridor and the Bradley Link indicate a joint consideration of the development implications. Council Document CC01 (Appendix 1.3) in response to the Inspectors Pre-Hearing Note 1 provides further information about the manner in which the Calderdale and Kirklees are working together to manage and mitigate the growth in the South East Calderdale/North Huddersfield area.

71. The 'Strategic Vision for South East Calderdale' (EV39) provides a high level site layout showing how each site is suitable to help address the housing needs of the district and sets a framework for place making across the two sites. Further studies have been provided for the site and are available in the Examination Library (SS35 – LP1451). A detailed masterplan will also be required at application stage in accordance with Policy IM7 of the Local Plan.

72. The Sustainability Appraisal (SD03.2) has assessed the Garden Suburb Approach and the "Pepper Potting" approach of sites around the district and found that the Garden Suburb Approach would provide the best opportunity to ensure high quality design, reduce the risk of impact on international and national areas of protection and conservation, increase the accessibility to services including public transport, health and education, as well as access to employment opportunities. The start date and delivery times of the garden suburbs are set out in the SoCG (CC07) between the Council and ID Planning.

74. / 75. The intentions of the “Garden Suburbs” have been set out in the Vision, Planning for Growth and Masterplan Policy sections of the Local Plan; as well as the ‘Strategic Vision for South East Calderdale’ (EV39). Although the site is not part of the Government's Garden Community Prospectus the principles of “garden cities” have been used to great effect to ensure enhanced local facilities and infrastructure, quality of design contribute to the sustainable development of these sites.

76. To support the draft allocation the following technical reports are available in the Examination Library (SS35-LP1451):

- Heritage Assessment
- Phase 1 Habitat Survey
- Drainage Strategy
- Ground Report
- Transport Assessment
- Masterplan
- Delivery Trajectory
- Additional Ecological Surveys.

77. The site consists of predominantly Grade 3 Agricultural Land which is not considered “high quality”.

78. Any planning application will have to be inline with Local Plan Policy ‘IM7 – Master Planning of Housing Sites’, ‘HS2 Residential Density’ and ‘HS3 – Housing Mix’ which will ensure a mix of properties to meet the Borough’s needs.

79. There are a range of densities across the site; however, the densities across the whole site may appear to be “low” due to the large amounts of open space provided and the provision of a Primary School.

80. The Council has not used the settlement hierarchy as the basis for the distribution of development. During early stages of plan preparation the Regional Strategy assumptions regarding distribution were used. In this case, Halifax had to take over 50% of the growth, with Brighouse taking a further significant proportion. As the Local Plan developed and the work was undertaken to understand the implications of the potential growth, it was found that Halifax could not accommodate as much developments as originally sought, because of the potential for significant effects upon the SPA and SAC as identified through the HRA process. South East Calderdale therefore became more attractive as a potential location for significant development.

81. / 82.

WSP are undertaking more detailed analysis of cross-boundary impacts from modelling.

83. The evidence provided by the Council and ID Planning is continually updated to support the allocation of this site.

84. Please see point 72.

85. It is considered that the allocation of this site does meet the aims and objectives of the Local Plan.

86. Paragraph 103 refers to the 2019 NPPF, however the equivalent is within paragraph 29/30 and 34/35 of the 2012 NPPF. The Local Plan is supported by Technical Reports produced by WSP Consultants and a Statement of Common Ground between the Council and Highways England as well as the Site Assessment Reports, Visioning Document and Sustainability Appraisal which have demonstrated that the requirements in the NPPF are met.

87. The Employment Land Study (EV01) and Employment Technical Paper (EV02) sets out the Employment Land to meet the Objectively Assessed Need. The sites allocated for Employment meet this identified need without using land within the Garden Suburbs. The Garden Suburbs main objective is to meet the housing requirement however there is scope to include small scale services/facilities to meet residents need.

88. It is believed the Plan has been positively prepared and will be effective in delivering the aims of the NPPF and Local Plan. Whether the Plan has been positively prepared will be tested through the Examination process where modifications may be requested to make the Plan sound.

89. The Sustainability Appraisal assesses both individual sites and the different scenarios of growth distribution.

90. See point 81. / 82.

91. See Evidence Document EV 33 Housing Technical Paper (2018) (paras. 3.1 -4.4), CC 01 Calderdale Council Response to INS/01 – Response to Pre-Hearing Note 1 Appendix 1.5, Background Paper BP 01 Cabinet Report 12.2.18 Housing Requirements and Allocations and Evidence Document EV 09 Exceptional Circumstances for the Release of Green Belt (2019).

Duty to Co-operate

Main Issues:

1. Local authorities have looked inwardly and not cooperated in terms of development requirements, Green Belt release and the Local Plan in general.
2. No evidence seen on consultation with Kirklees regarding their development on/near border.
3. This development does not co-operate with the Kirklees/Bradley Wood plans.
4. There has been no in-depth analysis of housing needs across the wider area. A wider approach should have been looked at collectively across authorities to plan development properly and not to add to already congested areas.
5. The combined effect of pollution from both this development and those on the Kirklees border has not been considered.
6. There has been no cooperation with Kirklees and Bradford on the setting of CIL.

Council's Response:

1 – 6. See Submission Document SD 13 Duty to Cooperate Statement Including Statements of Common Ground (January 2019).

1. Leeds City Region Local Authorities have agreed to undertake local reviews of Green Belt as required in preparing Local Plans as set out in the DTC Statement.

2. / 3. The DTC Statement and the Statement of Common Ground between Calderdale and Kirklees sets out how the two Local Authorities have co-operated on strategic sites.

4. The Calderdale SHMA (2018) (EV36) demonstrates that Calderdale is a predominantly self-contained

housing market, albeit with linkages to other areas. Therefore, the Local Plan aims to accommodate all the objectively assessed needs identified for housing within Calderdale. A similar approach of meeting their own needs is being taken by neighbouring authorities.

5. The West Yorkshire Authorities have jointly produced the West Yorkshire Air Quality Technical Guidance and the West Yorkshire Low Emissions Strategy in consultation with Public Health England in order to reduce harmful emissions and improve air quality. This work is reflected in the Local Plan policy on Air Quality and in the land allocations assessments, including referencing the above documents where mitigation measures are required. WSP in their transport modelling for the Local Plan also considered key air quality elements providing evidence able to be utilised in further strategic work on air quality.

6. There is no duty to co-operate on setting of CIL, however, Calderdale is part of a Leeds City Region CIL working group and has requested comments from both Bradford and Kirklees on the CIL Preliminary Draft and Draft Charging Schedule.

Suggested Modifications

1. Garden Suburbs should be clearly defined.
2. The policy is flawed and it should be reassessed.
3. The policy should be amended to include garden city principles for garden suburb proposals to ensure the schemes integrate exemplar levels of design and sustainability and early community involvement including the preparation of an engagement strategy.
4. Remove this site from the Local Plan and use Brownfield land.
5. Amend developable area to reflect recommendations of the HIA and ecological constraints.
6. Reduce capacity of the site to protect heritage and ecology assets and infrastructure capacity. This will give a fairer distribution of development across the borough.
7. A detailed traffic plan needs to be consulted on.
8. A detailed report on projected pollution levels should be produced and consulted upon.
9. The building of a new road system to relieve the pressure on Brighouse and the surrounding area to include a bypass and a new river crossing.
10. New doctors' and dentists' surgeries, and proper educational facilities are required if this development goes ahead.
11. Clarification of infrastructure improvements required.
12. Further public consultation. Further research on the viability and effects the extra people will have on the local area and services.
13. Build on smaller sites across the whole of Calderdale rather than over- developing green belt land.
14. Revert back to the sites proposed in the 2017 LPID consultation.

15. Provide necessary infrastructure before site is developed.
16. If an inspector were to approve the site for development Early phasing should be removed or revised until such time as main access can be provided from A641 to protect the existing residential area at Woodhouse.
17. In-depth analysis of housing needs across the wider area is needed.
18. Woodland and Calderdale Wildlife Habitat Network should be retained at the site in form of the rail corridor.
19. Sensitive lighting schemes and landscape plans (including SuDS) to achieve a net gain in biodiversity should be provided.
20. Full comprehensive master planning should be undertaken from the start with community involvement.
22. Council needs to evidence that concerns of residents have been taken into account following consultations.
23. Amend the penultimate Site Specific Consideration to read:-"Implementation of the mitigation measures set out in the Heritage Impact Assessment".
24. Sustainability appraisal should adequately assess the holistic sustainability of individual sites.
25. Sustainability scores should be verified.
26. A bat survey should be carried out.
27. Policy IM7 to be amended to include a requirement for outline approval for the whole site and to ensure the principles of garden suburbs are adhered to.
28. This allocation should also include employment uses.
29. The housing and employment strategy of the plan is reviewed in light of revised population projections to ensure soundness.
30. The following surveys are required to be carried out by impartial professionals:
 - Ecology;
 - Traffic & transport;
 - Noise & air quality;
 - Geological & Archaeology;
 - Historic Environment; and
 - Public services - schools, local amenities, healthcare, employment
31. The site boundary should be extended to include LP0862 to provide an access point for site LP1451 from Huddersfield Road.
32. West Yorkshire Low Emission Strategy should be removed from site specific constraints.

33. The CIL needs to be further investigated to ensure the South East gains proportionate recompense for the damage that will be done.

34. The traffic assessment for this site needs to include an interrogation of Calderdale's strategic transport model examining traffic volumes ('actual flow - total') as well as V/C ratios.

35. A SFRA Level 2 assessment should be completed for the site.

36. Site should be on a significantly smaller foot print of no more than 200 houses with a 20m green buffer between existing and new housing.

Council's Response:

1. The intentions of the "Garden Suburbs" have been set out in the Vision, Planning for Growth and Masterplan Policy sections of the Local Plan; as well as the 'Strategic Vision for South East Calderdale' (EV39). Although the site is not part of the Government's Garden Community Prospectus the principles of "garden cities" have been used to great effect to ensure enhanced local facilities and infrastructure, quality of design contribute to the sustainable development of these sites.

2. There is no basis for this assertion.

3. Along with the IDP, Policy IM7 of the Local Plan (Master Planning of Housing Sites) contains various requirements that master plans should aim to achieve.

4. 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.

5. / 6. The developable area takes into account the constraints of the site.

7. It is the Local Plan which is consulted on. There is, within, the Examination Library a large number of transport evidence which the Plan is based on. Furthermore, the Council has established an adopted Transport Strategy (EV58) which supports many of the aspirations within the Local Plan.

8. 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.

9. 10. 11. 15. 16. The Local Plan is supported by the Infrastructure Development Plan (EV42.1) which sets out the infrastructure requirements resulting from the growth proposed in the borough. The IDP has been updated to include a table setting out the Local Plan housing trajectory and the provision of critical infrastructure. This table shows the cumulative trajectory; the individual infrastructure projects that need to be delivered by that point in time; funding status; regulatory status; construction status and lead agency/partners.

12. 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.

13. Most Councils use 0.4ha as the lower limit for allocating sites. Calderdale decided to reduce this to 0.25ha in the assessment process. The Strategic Housing Land Availability Assessment (SHLAA) used 0.1ha as the lower assessment level. Small sites can still come forward as “windfalls” or as allocations in Neighbourhood Plans.

14. The sites proposed in 2017 LPID (PC01.1) consultation included more sites than required for the Local Plan Publication draft housing requirement.

17. The Calderdale SHMA (2018) (EV36) demonstrates that Calderdale is a predominantly self-contained housing market, albeit with linkages to other areas. Therefore, the Local Plan aims to accommodate all the objectively assessed needs identified for housing within Calderdale. A similar approach of meeting their own needs is being taken by neighbouring authorities.

18. / 19. The mitigation measures identified within the ‘Site Specific Considerations’ 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 further evidence, which may make varying recommendations in terms of mitigation to site constraints.

20. In accordance with Policy IM7, the production of a master plan for strategic housing sites should involve all relevant stakeholders, including the Council, infrastructure providers, landowners, developers, the local community, service providers and other interested parties. Master plans should be developed in consultation with the Council prior to the submission of a planning application.

22. The Council’s Regulation 22 Consultation Statement outlines the consultation undertaken on the Calderdale Local Plan Publication Draft and provides a summary of the representations raised during the representations period.

23. The purpose of the Heritage Impact Assessment (HIA) is to inform the site allocation process of the Local Plan. Through assessment of the significance of the historic environment, the likely impact of allocation on affected heritage assets, both designated and non-designated, is identified and consideration given to whether such impact can be mitigated.

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.

24. The Sustainability Appraisal (SD03.2) has assessed the Garden Suburb Approach and the “Pepper Potting” approach of sites around the district and found that the Garden Suburb Approach would provide the best opportunity to ensure high quality design, reduce the risk of impact on international and national areas of protection and conservation, increase the accessibility to services including public transport, health and education, as well as access to employment opportunities.

25. The Council considers that the supporting text contained within the Sustainability Appraisal adequately explains the approach utilised.

26. Ecological appraisal including ecological surveys of protected species has been recommended in the reports required.

27. IM7 is worded in a way that the policy applies to the strategic site not just the development proposals. So sites such as LP1451 will required a masterplan for the whole site not just the phases which has a planning application on.

28. The Employment Land Study (EV01) and Employment Technical Paper (EV02) sets out the Employment Land to meet the Objectively Assessed Need. The sites allocated for Employment meet this identified need without using land within the Garden Suburbs. The Garden Suburbs main objective is to meet the housing requirement however there is scope to include small scale services/facilities to meet residents need.

29. The Standard Methodology used in the Publication Draft Local Plan to set the housing figure uses the relevant population projections as set out in the NPPF/PPG.

30. ID Planning are working on behalf of the land owners to submit all the relevant studies to demonstrate the suitability of this site. These documents will be available on the Local Plan Examination Library within SS35-LP1451

31. The site can be accessed from Huddersfield Road using the current site boundary.

32. The mitigation measures identified within the 'Site Specific Considerations' 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 further evidence, which may make varying recommendations in terms of mitigation to site constraints.

33. In setting the levy rates, Calderdale Council considers it has struck an appropriate balance between;

- a. the desirability of funding from CIL in whole or in part the actual and estimated total cost of infrastructure required to support the development of its area, taking into account other actual and expected sources of funding, and
- b. the potential effects, taken as a whole, of the imposition of CIL on the economic viability of development across the Calderdale District.

34. The traffic modelling has informed the Council about the implications of the development strategy and has helped with the identification of interventions within the IDP and the Transport Strategy. The Council does not accept that the Local Plan does not respond to the clear evidence relating to road traffic growth.

35. ARP Associates – Chartered Consulting Engineers have undertaken a drainage assessment of the site (SS35 LP1451 – Drainage Assessment in the Examination Library). It concludes that with compliance to the mitigation set out in the report, the proposed development can satisfy the requirements of the NPPF and PPG in relation to flood risk and surface water drainage strategies.

36. This size of site would not meet the Council's housing requirement.

Document Section: LP1463 - Garden Suburbs - Brighouse

Representations

Comment ID **APX1009**

Site ref (if applicable): **LP1463**

Person ID: **1183610**

Name: **Mrs Penny Johnston**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Land at Thornhill Lane was designated by Calderdale as greenbelt. NPPF Paragraph 83 requires exceptional circumstances to be demonstrated before land can be removed from the green belt. I don't believe this has been done. Para 84 requires any review of green belt boundaries to take account of promoting sustainable development. The addition of 2000 houses in this area is not sustainable in terms of infrastructure, air quality or drainage.

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

Sound Reason:

Infrastructure There is currently no evidence to demonstrate a significant improvement to the highways infrastructure to support the housing proposed in Clifton and Woodhouse areas. Brighouse is already regularly gridlocked with queues along all A roads at busy times. Disproportionate The plan proposes 50% of housing and 40% of industrial sites for the Brighouse area with both garden villages to be situated within 1 mile of Brighouse town centre adding a huge increase to the volume of traffic on already over congested routes. Brownfield sites which were previously highlighted for housing by Calderdale have now been removed. Why not use these? There has been no justification for their removal. Air Quality Brighouse is already in an Air Quality Management area. To add approximately half the housing and industrial development in this area will not improve this situation. Environment The development will lead to loss of wildlife habitats Even with sustainable drainage the construction of 2000 dwellings can only lead to an increase in surface water run off during times of prolonged heavy rainfall. Surface water will end up in Thornhills Beck and ultimately the Calder both of which are prone to flooding already. Community Infrastructure Levy Why is this so much lower for Brighouse than other areas of Calderdale? There is no justification for this

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

Duty to Co-operate Reason:

Taken alongside the other developments proposed in Calderdale, there is an additional 1800 dwellings proposed in Bradley, Kirkstiles, There does not appear to have been any meaningful consultation between the authorities as to how the M62 will cope with the increased volume of traffic, or for that matter the surrounding road infrastructure.

Suggested Modifications:

Reinstate the use of brownfield sites previously highlighted and reduce the number of dwellings proposed for Brighouse Implement schemes to attempt to increase the air quality not decrease it

Additional Evidence Link:

Comment ID **APX1025**

Site ref (if applicable): **LP1463**

Person ID: **717690**

Name: **Mr Jason Carlton**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The Local Plan should be assessed against NPPF 2018 and NPPF 2012.

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

Sound Reason:

Failure to follow strategic objectives SO1 - Sustainable development Sustainable development would be better achieved by developing all brownfield sites, then infill sites before destroying greenbelt. Sustainable development should also ensure site is deliverable, and the number of missing or inconclusive evidence around deliver, infrastructure raise doubt about this site. SO2 - Climate change The economic viability of the site suggests renewable energy will be capped at 10% in order to make the site viable, SO4 - Housing There is no clarity around the affordable housing ratio for this site (25% is suggested in one part of the plan), and yet the site viability assessment suggests affordable housing will be less than this to make the site viable. Promoting this site over brownfield sites (available across the borough) contravenes the strategic policy, there is also a complete lack of clarity around the affordable housing ratio SO5 - Green infrastructure & natural environment The site performs highly as a well-defined section of greenbelt and agricultural land that performs a natural break between distinct parts of Clifton and Brighouse. It is unacceptable to destroy large-tracts of well performing greenbelt when smaller, and more deliverable, brownfield sites exist. Allocating the site will lead to the loss of valuable greenbelt land. If the development is permitted, it will also increase noise and flicker from wind turbines over the area. SO7 - Transport Located on a 1 on 10 gradient from Brighouse, the site will not encourage a reduction in car usage, it is likely to increase car use - with Brighouse Railway station already at peak-hour capacity, there is little evidence to suggest how developing the site will reduce car ownership. The site risks becoming a commuter settlement for Leeds and Manchester. SO8 - Communities and Narrowing the gap The scale of the site means Calderdale will be focusing a significant amount of resource in South East Calderdale, thus denying resources to improve the health and economic of deprived parts of the borough. Other considerations : 1. Viability My comments made in 2017 appear to have been ignored. I challenged the CIL at £40 psm in 2017 and did not receive an answer from Calderdale. The site viability is questionable. The CIL for Brighouse is recommended at £40 psm, less than half some parts of the borough. It is clear from the Viability Assessment that the policies for this allocation are still insufficiently defined - how can we make a meaningful assessment of the site when the Viability Report makes recommendations that the Council does not appear to have acknowledged? It is also unclear if the CIL will apply to this site, or the Council will make use of an 'Exemption' Viability Assessment [Accessed 30/09/19 12:45 See <https://www.calderdale.gov.uk/v2/sites/default/files/Viability-assessment-2018.pdf> 11.8] 2. Highways My comments (attached), and comments by the Clifton Village Neighbourhood Forum made at the Regulation 18 consultation in 2017 on highways infrastructure appear to be have been ignored - I consider this alone is enough to question the soundness of the plan. 3. Lack of detail Considering this is the largest site allocation in calderdale, I would expect the evidence base to be further advanced that present, the appendix notes the following reports required: - Hydrological Assessment as part of a Flood Risk

Assessment - Transport Assessment - Ecological Appraisal including ecological surveys (such as Phase 1 habitat, botanical, protected species and ornithological surveys) and an ecological record searches with West Yorkshire Ecology and the Calderdale Bird Conservation Group - Ecological Impact Assessment and Ecological Management Plan will be required - Contaminated Land Assessment - Noise Impact Assessment - Predetermination Archaeological Evaluation - Masterplan Whilst I accept planning and scoping evidence should be proportionate, considering the significant impacts that this site would have on South East Calderdale, I find it unacceptable - and certainly unsound - that more work has not been presented at this point. Of particular concern - with the transport assessment, contaminated land and ecological assessments missing from this evidence base, how can we be confident the site is viable and deliverable? 4. Disproportionate concentration in South East Calderdale The allocation, along with the nearby Woodhouse site and the large-scale developments at neighbouring Kirklees means the pressure on local infrastructure will be significant. There is no certainty that the required interventions have been thoroughly costs, verified deliverable and the funding available. 5. Method for allocating the site If the allocation presented as distinct plots rather than a large site (easy considering the allocation is owned by several land-owners), we would have the opportunity to support development on part of the site. I believe some parts could - and should - be developed, but this 'all or nothing' approach denies us the opportunity to shape the plan.

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

Duty to Co-operate Reason:

Suggested Modifications:

1. Assess the site now against NPPF 2012 and NPPF 2018 guidelines with the evidence Calderdale already presented, particularly as future developments will be judged under NPPF 2018. 2. Reject the site allocation unless Calderdale can substantiate how disregarding six of their ten strategic objectives justifies development of this site

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5074505>

Comment ID **APX1027**

Site ref (if applicable): **LP1463**

Person ID: **1123479**

Name: **Mrs Lindsay Croft**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The people of Brighouse have not been made aware of the full impact of the local plan. I live and work in Brighouse and was not fully aware. It is only by knowing residents of Clifton that it has been brought to my attention. The back at the bottom of Thornhill Back Lane is often too high to pass by car. Brighouse is already congested at peak times with a 5 min journey often taking 1/2 hour especially if the m62 has problems! The area is a lovely tranquil space.

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

Sound Reason:

Green belt - Enjoyed by many of the residents of Brighouse and is home to abundant wildlife, many of

which are threatened species. The addition of so many houses will have a negative impact on the air quality in and around Brighouse. As an asthma sufferer this worries me. The plans to improve infrastructure is weak and ill thought out. It is unclear if a proper plan is in place with regards to provide school places, doctors, dentists etc. The local schools are already oversubscribed and there doesn't seem to be a feasible plan to address this. This area should not be built on. the new housing should be spread equally throughout the borough. This area is green belt and should be protected.

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 **APX1122**

Site ref (if applicable): **LP1463**

Person ID: **1184867**

Name: **Miss Helen Rowlands**

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:

I live in Hipperholme but work in Clifton and my children go to school in Brighouse the journey to school & work is already exhausting as the traffic is so bad through Hipperholme crossroads and down into Brighouse. There is only 1 way through Brighouse to Clifton and it is often at a standstill. The development of 2000 houses in Clifton will have a massive impact on the flow of traffic. My childhood home is in Clifton and I feel privileged to have grown up in such a beautiful area, the green belt is definitely to be protected for future generations to enjoy as I did. The green belt is supposed to prevent urban space, if this development goes ahead it will create exactly that. I worry about the air quality too as my children spend a lot of time in and around Brighouse. The extra traffic created by so many houses can only add to an already big problem of air pollution in Brighouse. It seems ridiculous that Brighouse has been chosen to have a larger development of houses than the rest of Calderdale. Brownfield sites should be used first and green belt protected. I don't think the council have done enough to inform the people of Brighouse just how their lives are going to be affected by such a big development. Where are all the children going to go to school? The doctors & dentists are over subscribed. The hospital waiting lists for appointments are really long how are the roads going to cope with all the extra traffic? I am also concerned about the risk of flooding to the Brighouse centre. Brighouse is in a bowl and all the run off from heavy rainfall swells the tiny beck that flows alongside Bradford Road with all the extra concrete involved in building such a large estate & the roads - Brighouse is going to be flooded on a regular basis. I do not think the council have done enough to spread the word about the proposed development and the impact on local peoples lives.

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

Duty to Co-operate Reason:

Suggested Modifications:

The houses should be spreadout over the whole of Calderdale and affordable housing built in the areas where it is needed. The green belt should be protected for future generations.

Additional Evidence Link:

Comment ID **APX1123**

Site ref (if applicable): **LP1463**

Person ID: **954577**

Name: **Mr M Bretton**

Organisation:

Agent ID: **229408**

Name: **Mr Jonathan Dunbavin**

Organisation: **Associate I D Planning**

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:

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:

See Attachment

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5084329>

Comment ID **APX1130**

Site ref (if applicable): **LP1463**

Person ID: **11325**

Name: **Mr Graham Stanley**

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:

I object most strongly to the Calderdale local plan and particularly the proposals for Site LP1463, which are not sound and contravene National Planning Policy Framework (NPPF) requirements. Calderdale is a local authority that has not met air quality targets. In an area where the council is supposed to improve air quality and which is identified as an 'Air Quality Management Area', it proposes to build 4000 houses in Brighouse and more than 2000 houses in the area designated LP1463. The resulting emissions will be catastrophic to air quality and will impact upon the health of the local population, particularly the senior and junior elements. The NPPF should promote and support the health and welfare of the population. The local plan is unsound. The plan proposes 'garden villages' of 2000 houses in Clifton and 1200 in Woodhouse and a further 1800 houses in the Brighouse area. This is a disproportionate allocation of new build to a comparatively small area of Calderdale. 3.9% of Calderdale is receiving 43% of development. The local plan is unsound. The NPPF identifies that a plan should 'take account of the different areas, protect the Green belt, recognise the intrinsic character and beauty of the country side and support the thriving rural community'. The NPPF requires any development 'to contribute to the protection and enhancement of the natural, built and historic environment and to safeguard the countryside from encroachment'. The Local Plan intends to destroy Green Belt and does not support these core planning principals of the NPPF. So goodbye to valuable farmland forever, goodbye to thriving habitat if many species of wild animals and birds and goodbye to the activities such as walking, horse-riding, running, cycling and dog walking, that contribute to the health and welfare of the existing community. The Local Plan is unsound. Climate change is happening and is no longer a topic that requires discussion. This proposed development on the hillside above Brighouse will remove natural drainage and encourage more serious flooding in the town. The Local Plan is unsound. It is suggested that this Plan is an opportunity to deliver new infrastructure. It will certainly be needed in all aspects if the plan is delivered. This cannot be guaranteed by Calderdale. One example of need is to relieve the frequent traffic congestion through Brighouse and also prepare for the future. Another is to manage and improve the strained local services, which are constantly requiring repairs, particularly water services. Roads are mainly the responsibility of the National Highway Department and services that of the private companies. In addition, schools come from the Department of Education and healthcare provision comes from the NHS of Private Practice. Retail and industrial development is certainly not in the remit of the Council. Community buildings and places of worship or gathering are beyond Council resources. The council can't even afford to keep the local refuse and recycling centre open for 5 days a week. The Local Plan is unsound. The community infrastructure Levy (CIL) of £40 has been set for Clifton. It is assumed that this will encourage development and developers. This is much lower than for other areas in Calderdale and cannot financially match the infrastructure requirement form proposed development. The Local Plan is unsound. In conclusion and having reviewed the Calderdale Local Plan I submit that it is unsound in all aspects and does not adhere to the NPPF.

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 **APX1131**

Site ref (if applicable): **LP1463**

Person ID: **1139647**

Name: **Mr George E Stanley**

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:

I wish to object to the Calderdale Local Plan and most importantly to the proposals detailed for site LP1463. I am confident that the plan is unsound and is not in line with the National Planning Policy Framework. The NPPF clearly supports the protection of Green Belt and the nature and use of the existing countryside. If the planners are allowed to destroy our Green and pleasant land, then the future for our children is bleak. Surely there must be many brown field sites available for the much needed housing and development? Air quality in our area of Calderdale is already below the national target. surely, the planned extensive development with all its resulting emissions would make the air quality targets for our area unattainable and put at further risk, the health of the local population? Developers are to be encouraged by a low community Infrastructure Levy for the area when compared with other areas of Calderdale. Surely this will present a real financial shortfall when the extensive new infrastructure is required? Comparatively recently Brighouse town suffered major flooding. Surely the removal of natural drainage on the hillsides overlooking the town by major development will put it at greater risk? In the plan the area of Brighouse and Clifton is to receive nearly half of all housing development in Calderdale. Surely this is an unfair and disproportionate burden upon this attractive and historic area.

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 **APX1132**

Site ref (if applicable): **LP1463**

Person ID: **1139653**

Name: **Mr James Leslie Stanley**

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?: **Yes**

Sound Reason:

I list my reasons for objecting to the Calderdale local plan and significantly my objections to the proposals for Site LP1463 as follows: I am confident that the proposals contravene the National Planning Policy Framework (NPPF). I am very concerned about the air quality targets. The Calderdale Authority has not met air quality welfare of the local population at greater risk. I understand that the Community Infrastructure Levy has been reduced significantly for the Local Plan in the Brighouse and Clifton area. This will attract developers, but will not provide sufficient funds for the massive additional infrastructure

required. I am concerned about what affect the proposed development on the hillsides above Brighouse will have on the town. There has recently been serious flooding and removal of natural drainage will likely increase the risk of even more serious flooding. I understand that the NPPF encourages protection of the green belt, should support local communities and retain the beauty and use of the countryside. The plan does the opposite of this. I understand that almost half of planned development in Calderdale is allocated by the plan to the Brighouse and Clifton area. Surely this is a disproportionate allocation and needs a serious, logical, realistic and fair review? By outlining my reasons for objecting to the Plan I wish to confirm my view this it is unsound.

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 **APX1133**

Site ref (if applicable): **LP1463**

Person ID: **1182231**

Name: **Mrs Rebecca Holmes**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Do you consider the plan to be Sound?: **Yes**

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 **APX1175**

Site ref (if applicable): **LP1463**

Person ID: **1183569**

Name: **Mrs Susan Squires**

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:

4. (1) Legally compliant The plan has failed to consider all the comments made under regulation 18 showing a lack of consultation. 4 (2) Sound The plan shows a disproportionate number of houses planned in Brighouse compared to the size of Calderdale. The infrastructure in place presently struggles to cope with the current levels of traffic. The plan does not show adequate improvement to the infrastructure to support the level of development planned. Calderdale has failed to meet the target for air quality and there will be additional pollution caused by the extra traffic. This will have a detrimental effect on the health of the residents. 4. (3) Complies with the duty to co-operate There is no evidence of co-operation in the planning of housing between Calderdale and neighbouring authorities. Housing planned by other local authorities is extremely close to the residential development proposed at Thornhills. The infrastructure will not be able to cope with the additional strains the developments will cause.

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

Duty to Co-operate Reason:

Suggested Modifications:

A review of the plan to show a more proportionate distribution of residential development throughout Calderdale with due consideration given to the location of developments in the neighbouring authorities.

Additional Evidence Link:

Comment ID **APX1176**

Site ref (if applicable): **LP1463**

Person ID: **1183568**

Name: **Mr Andrew Squires**

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:

A lack of public involvement where plans have been changed in the publication draft that have not been consulted on. Only six weeks was given by the council over the summer holidays where many people were away. Increasing the size of Clifton by 50% and Brighouse more than 32% is madness. The required infrastructure is not in place for such a large development e.g., extra roads, schools, doctors, dentists etc. Extra traffic will create more pollution near Clifton school creating more asthma and breathing problems for local children where the local school is close to the pollution of the M62.

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

Duty to Co-operate Reason:

Suggested Modifications:

More time and involvement by the council should be done. They do not care about the views of the people of Clifton and Brighouse. There is already pollution coming from the Armitage industrial estate which bellows over Clifton and Brighouse when the council do not care. Pollution is a great problem for Brighouse and Clifton where Calderdale do not meet pollution targets. There are so many houses on the local plan it will cause traffic chaos for Clifton and Brighouse and more accidents on the junction 25 M62. There is also a great risk of flooding in Brighouse when the green fields of Clifton are turned into concrete and tarmac. Many other brownfield sites around Calderdale which should be built on first before green belt land.

Additional Evidence Link:

Comment ID **APX1201**

Site ref (if applicable): **LP1463**

Person ID: **1163507**

Name: **Mrs Janet Stanley**

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?: **No**

Sound Reason:

The local plan (LP1463) is NOT sound and I strongly object to the proposals in LP1463. The plan does not comply with national planning polict in a number of ways. Firstly, with regards to air quality Calderdale is one of 23 local authorities in England that have not met air quality targets for better air. Calderdale council is proposing to build 4000 houses in Brighouse and over 1900 in LP1463. Brighouse is one of the seven areas in Calderdale identified by the council as an air quality management area - declared because the annual average concentration of nitrogen dioxide is being or is likely to be exceeded. The air quality is poor because the area of Brighouse including Clifton and Thornhills is only one mile from the M62 junction 25. The m62 is consistently busy as t is the link between Leeds to the east and Manchester/Liverpool to the west, with link to the M6. The M62 gets congested very easily and very regularly. It is frequently at a stand still due to accidents/incidents, at which point the local area becomes grid locked. People try to avoid the main routes and this causes major issues including dangerous/unsafe practices. Everyday there is also serious congestion on the cross border route into Kirklees from junction 25. Calderdale council is also proposing to build an enterprise/employment zone at junction 25. (LP1232). All the proposed development with the increase in vehicle emissions can only produce poorer air quality. There is a proven link between poor air quality and an impact on health. There will be a detrimental impact on healthy lifestyles, an increased risk of heart and lungs conditions, particularly for those most at risk ie your children, elderly, those suffering from lung disorders. This in turn will have an impact on access to local medical and hospital services. Any proposals from Calderdale council to include cycling routes as a solution to infrastructure problems has not been thought out - who will cycle in an increased polluted environment caused by a massive increase of vehicles due to the propose development in housing? Pollutions and road safety issues discourage people form being physically active. There is no doubt that LP1463 will affect the health of the community. Calderdale Council does not meet National Planning policy because their plans do not enable and support healthy lifestyles. Secondly, The plan is not sound because Calderdale council has proposed 'garden villages' of almost 2000 houses at Woodhouse in Brighouse. This is a disproportionate allocation. In

addition to the other proposed new housing sites in Brighouse this takes the total number of new houses for Brighouse to be over 5000, more than any other are in Calderdale. Brighouse are is 3.9% of the area of Calderdale and the Calderdale local plan is proposing 43% of all development in Brighouse. Calderdale is proposing in total 9460 houses for the whole of the Calderdale area. This is totally disproportionate. I accept that there should be a fair distribution of houses to be built in the Calderdale area but I object very strongly to the disproportionate allocation in the Brighouse community. Furthermore the site of the proposed garden suburbs (LP1463) is designates existing green belt. Following a green belt review by Calderdale council the land at LP1463 was identified as 'most' sensitive green belt parcel. The council also commented that the site performs an important role in safeguarding the countryside from encroachment. The council state that the changes to the Calderdale green belt is "clearly a last resort" and "have been minimised." This is not the case considering the planned use of greenbelt in LP1463. The area LP1463 currently contributes Thornhills, Clifton and Brighouse - walking, running, cycling, dog walking, horse riding. Thornhills land and area is home to wildlife - foxes, deer, numerous species of birds, hedgehogs, hares, bats, newts. Thornhills lane and the surrounding fields of LP1463 form most of the Calderdale way and is used regularly by local people an visiting bikers. the disproportionate allocation of houses in LP1463 can only serve to create a major impact on the local environment - on people, wildlife, lifestyles and will create an environmental change in Brighouse. As land is built upon the Thornhills/Clifton hillsides, there will be no fields left to soak up rain water and this will result in flooding in Brighouse. The frequency of flooding will increase as climate change increases. Climate change is now accepted - there is no longer a discussion around climate change - it is happening. Brighouse will suffer greater flooding than it does already - and more frequently. Thirdly, the plan's not sound because of the lack of infrastructure. The increased housing in Brighouse will require major rebuilding of roads. When the M62 gets blocked Brighouse comes to a stand still. Clifton common is frequently blocked from the Kirklees border at the top of Highmoor Lane all the way down to the inadequate mini roundabout at the junction until Wakefield road. The proposal for the planned enterprise/employment zone (LP1232) link relief road linking to Clifton common will create more congestion for people trying to arrive at and leave the zone if they do not use the motorway or if the M62 is congested/blocked. The number of cars for the 1900 houses (possibly 3800?) plus the people working at the enterprise/employment zone will saturate the area. There is 1.5 million square feet of disused warehousing within a 5 mile radius of the employment/enterprise zone (LP1232) is not needed. In addition to the road issues, there is no planned lifestyle infrastructure ie hospitals, medical services, schools, social facilities. There has been no consideration of the impact on sewerage, utilities and telecommunications in August 2018, as Clifton common and Thornhills Lane, there were five sets of road works cutting off water to homes in the really hot summer due to water supply problems - broken underground pipes. As the housing numbers increase there will be a greater ageing population in Brighouse - nothing as been geared towards this when planning the proposed site LP1463. Finally, the local plan is not sound due to the community infrastructure levy (CIL). The council set the CIL and has adopted the use of different rates for CIL across Calderdale. The CIL for Clifton is £40 - this is in comparison with a different area of Calderdale eg Hebden Bridge at CIL £85. The purpose of the levy (received from the builders/developer) is to build the infrastructure for the area. This low levy charge cannot provide the finance required for the massive infrastructure required to support LP1463 and to support the town of Brighouse. Brighouse is due to receive 5000 extra houses. Brighouse is already a 'bottle neck'. The council has stated there will not be an additional junction (J24A) to help with the traffic flow to/from the M62. A proposed new road by passing the centre of Brighouse includes a new 'fly - over' at the bottom of Clifton common and the conversion of an old railway bridge at the bottom of Thornhills Beck Lane - a railway bridge hardly wide enough for two cars. This proposed is totally inadequate for the infrastructure required to support any development.

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 **APX1217**

Site ref (if applicable): **LP1463**

Person ID: **1121198**

Name: **Mr Adrian Frearson**

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 attached

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/5104184>

Comment ID **APX1254**

Site ref (if applicable): **LP1463**

Person ID: **1136150**

Name: **Mr Peter Toothill**

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:

THIS COMMENT WAS RECEIVED AFTER THE CLOSURE OF THE REPRESENTATION PERIOD. The plan does not include any improvement to local traffic systems which are already overloaded. There is poor provision for extra traffic, no new school or medical facilities despite existing ones being oversubscribed. This plan butts up against other areas plans and developments creating urban sprawl, leaving no green space between it and other Council areas, effectively cutting off green corridors and destroying wild life habitat some of which houses some rare species. The air quality in the area is already poor and will only be made worse by this development.

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

Duty to Co-operate Reason:

Suggested Modifications:

THIS COMMENT WAS RECEIVED AFTER THE CLOSURE OF THE REPRESENTATION PERIOD. Improve the roads and infrastructure first - before developing anything. Build housing where it is needed rather than have more commuter traffic. Spread Development evenly over the Council area not all in one place.

Additional Evidence Link:

Comment ID **APX144**

Site ref (if applicable): **LP1463**

Person ID: **1116260**

Name: **Mrs Sarah Tindal**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Despite very detailed Consultation Statement which claims, 'the consultations have not only influenced sites, policies and text, but also the decisions that the Council has taken concerning the development of our evidence base.' The feedback, evidence and representations made in relation to LP1463 have not led to any changes to strategy. Indeed, the Assessment Report - Main report, relating to this site has raised many concerns and issues which have been ignored by the subsequent plan. For example; there states to be insufficient ecological information to identify the impact of development on the site. In addition, there are still many constraints and reports required and yet the scale of this development remains in its originally planned state. I feel the council have 'ticked the boxes' to show legal compliance but have failed to follow the true spirit of the need to consult with integrity. There is no evidence that the council have listened to the consultations regarding this site. Residents of Thornhills (the area with the largest proposed development in the borough) were excluded from the recently approved Clifton Neighbourhood Planning Forum at the request of the Council. This fails to ensure the government's principle for community engagement as set out in National Planning Policy Framework (NPPF) paragraph 155 which states: "Early meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made" The largest number of representations gained from the public was 8,000 people making 28,230 comments out of 209,500 people in Calderdale (June 2018 ONS). This only equates to 13.5% of the Calderdale population. Furthermore, the system of making representations has been so difficult, time consuming and technically involved that the council has failed in its obligation to meaningfully engage a wide range of the Calderdale population. Those of the elderly and vulnerable groups have not been engaged sufficiently and are excluded from participating because of the technical abilities required to do so.

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

Sound Reason:

There are still many substantial constraints and missing reports for this plan to be sound. How does the

proposal of 2000 homes in this area, in addition to an employment zone less than a mile away, improve the already poor Air Quality? Currently the area is in very close proximity to a Air Quality Management Zone. 2000 homes is likely to substantially increase the traffic (perhaps to an additional 4000 cars), plus the transport which will be associated with the employment zone. The area is one of 23 Local Authorities in the UK to have already failed to meet their air quality targets. What mitigation, which is sound and sustainable, can the council put in place to mitigate from a further deterioration to the local poor air quality experienced by the people of Thornhills, Clifton and Brighouse? Where cycling and walking are considered mitigation it seems unrealistic to expect this to make the level of mitigation that will be necessary to match the size of the development. What does the council propose to do to deliver the infrastructure (roads, schools, doctors, etc) that will be necessary for such a huge development? particularly with the substantially lower Community Infrastructure Levy set in comparison the levy set in the west of the borough. The current plans do not show that this aspect has been strategically planned for to enable to plan to be sound financially and practically. There is a worrying gap in understanding, knowledge, data and planning in relation to the ecological impact of the plan on the area. The councils own Assessment Report identifies a lack of data to be able to thoroughly and robustly assess the ecological impact. Local knowledge is that there are several UK BAP species that need protection (tree sparrows and green finches being two of them), this plan is therefore unsound as it has failed to identify these impacts or to consider the alterations necessary to protect the ecological diversity of the area. One of the UK BAP species; the tree sparrow, has a colony in this site (one of of only two in the whole of Calderdale). This species has seen a 95% decline (British Trust for Ornithology) and needs old trees, hedges and farm buildings to survive. This has not been recognised in this LDP and with that in mind the plan is not sound. The term 'garden suburb' fails to identify where the open spaces will be in relation to the 2000 houses and employment zone. The plan is to build on the open space which currently exists for the people of Brighouse. What do the council propose in relation to the protection of and creation of open space for the current people of Brighouse in addition to the thousands who will inhabit the new development? This is a small greenbelt area of Brighouse in contrast to the larger expanses in the west of the borough. The greenbelt review identifies this site of greenbelt to be of high sensitivity and yet it is still included for the largest development in the borough. Why is this? How does the council mitigate this substantial loss of highly sensitive greenbelt and its associated biodiversity? How will it protect this for the future generations of this area of Calderdale? The above reasons clearly show that the LDP in its current state is not sound or robust to ensure sustainability for the future.

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

Duty to Co-operate Reason:

To my knowledge there has been little robust co-operation between Kirklees and Calderdale as to the significant impact the two LDPs will have on the area around the borders (of which this site is one) and the strategy for ensuring continued cooperation for the longer term future impacts. It is very unclear who is responsible for the mitigation of transport and ecological impacts occurring.

Suggested Modifications:

A review of the Section 18 comments made in relation to this site and a thorough response to ensure everything has been considered. This review should include the following points: There needs to be a robust ecological appraisal (which was a recommendation in the Site Report) and thorough ecological record searches of West Yorkshire Ecology and the Calderdale Conservation Group. This is a crucial step which must happen, and should have happened to inform this plan. The conclusion of the councils own Assessment report stated that 'Some development likely to be acceptable but likely to need to be considerably scaled down.' This conclusion has been ignored. The size of the allocation to be significantly reduced to reflect the concerns raised and to protect some of the small area of greenbelt in Brighouse for ecological, biodiversity, public well being and air quality issues. More effort from the council to ensure

elderly and vulnerable people of Calderdale can truly make representations and be taken seriously.

Additional Evidence Link:

Comment ID **APX171**

Site ref (if applicable): **LP1463**

Person ID: **1181816**

Name: **Mr A 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:

Every working day my wife and I travel to our separate places of work from our home address on Clifton Common. Unless we are leaving before 7am or arriving home after 7pm then we typically have to queue to get from one side of Brighouse to the other. At least once a week when there is a traffic incident along the M62 corridor this traffic gets significantly worse and will often be queueing past our house all the way up to Clifton village. Given the proposed changes the increase in traffic would make this a daily event and the increase in pollution (noise / fumes etc.) would negatively impact on our health. Recently our neighbours proposed a small scale development (16/00932/OUT) which was rejected. One of the main reasons for the rejection was due to the concerns raised by the Highways Department so we can't understand why this proposal could possibly be accepted given that it is in effect making a similar change but on a much grander scale. We do not object to some development taking place, but it should be balanced across the whole of Calderdale with each area taking it's "fair share". Given that the infrastructure in place (roads / traffic / drainage / GPs / town center size etc.) is already struggling, we fail to see how this area can cope with the proposed changes without having the relevant infrastructure to 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 **APX21**

Site ref (if applicable): **LP1463**

Person ID: **1129577**

Name: **Mr Anthony Dolphin**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

A development this size must have legal issues somewhere. Is this a joke??!!

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

Sound Reason:

More volume of traffic added to an already struggling j24 of M62. Flooding risks. Not enough schools for current residents. No plans for improvement of sewerage works or mains? Increased risk of RTA's. Destruction of green belt and reduction in value of existing property.

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 **APX309**

Site ref (if applicable): **LP1463**

Person ID: **1182109**

Name: **Mr Steve Maxwell**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

As per usual Calderdale hide behind old,antiquated methods of trying to reach it's clients via the usual avenue's. Newspapers,work groups,small A4 notices attached to lamp posts,Libraries. have you never heard of the Social Networks ? Most people in Brighouse will not be aware of the impending melee.

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

Sound Reason:

Looking into this proposed development the issues arising will be in the form of poorer air quality and noise pollution levels which are already above the recommended levels due to the M62 corridor and feeder arterial routes around Brighouse/Huddersfield/Bradford and Leeds. Building a road to remove the bottle neck at the roundabout at Clifton Common and Wakefield road will only move the congestion to Bailiff Bridge which will then back up in a few years back into Brighouse. 2,000 homes will equate to "roughly" 6,000 cars !!! Question ? How many cars travel from Jct25 through Brighouse on the only road through a valley ? I consider that you have not studied this at "peak times" which is most of the day,these days. Flooding has always been a problem on Wakefield road, how are you solving this issue ? You are not protecting the greenbelt around Clifton which you are so fond of promoting in your UDP plans for the rest of Calderdale,clean air and freedom to walk/cycle/enjoy the countryside..... Please look at the demographic areas and develop an area of Calderdale that needs regeneration that will be happy to see re-growth not annihilation. The Calderdale Way/Kirklees Way are used regularly by walkers and families in the evenings and weekend, how are they going to enjoy that when walking through an estate of 2000 houses !!!! Protect your Greenbelt Calderdale.....

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

Duty to Co-operate Reason:

Listen to the people that you are about to effect. That is your duty to co-operate Calderdale

Suggested Modifications:

Remove the proposal from the UDP

Additional Evidence Link:

Comment ID **APX310**

Site ref (if applicable): **LP1463**

Person ID: **1130110**

Name: **Mr John Rowlands**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The vast majority of people from brighthouse that I personally have spoken to had no idea about the plans to build the garden village, and the majority are horrified at the thought of such a vast development. There has been inadequate advertising of this proposal, and people are in the dark. It is only through the participation of the people of CLIFTON that the word is spreading.

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

Sound Reason:

Flooding: the land below and above Thornhills lane is often subject to flooding after periods of heavy rain the ford becomes only passable by 4 wheel drive vehicles. The extra run off from the concrete jungle of 2000 extra houses and association roads will have a massive detrimental effect on the water levels of the Beck. What steps is calderdale taking to protect brighthouse town center and Bradford road from flooding? Only 18 months ago the whole of brighthouse town center was submerged after prolonged heavy rain. highways: the council seems to have no plans in place to improve the highways surrounding brighthouse to cope with the increased levels of traffic associated with such a big development. The roads are clogged up at peak times as it is. It only takes an accident on the m62 And this happens regularly on a weekly basis sometimes daily., and brighthouse becomes gridlocked ecology: the balance of nature and environment is surviving well at the moment. There are hares, a herd of deer, rare and threatened species of tree sparrow, at least two species of bats and rare insects. There are curlew, which are a rare sight in the countryside. All this will disappear if the development goes ahead. open space: the fields and surrounding area are enjoyed by the people of brighthouse and surrounding areas. People come to walk in the fresh air, look at the wildlife, bird watchers naturalists, horse riders and cyclists. There are horses cows and sheep even alpacas to look at in the fields. The area is very well used by the people of calderdale and it would be criminal to destroy all that green belt. minerals site: it is my understanding that there are still mineral rights on parts of the site, a large proportion of the site has been mined in the past and in places is unstable. environmental health: the effects on the already poor air quality will be detrimental to the people of brighthouse. Those who try to walk into brighthouse past the queues of traffic are already suffering the consequences of poor air quality. Any increase in the number of cars, vans and lorry's from the proposed enterprise zone is going to create An even worse atmosphere for the residents and the workers of brighthouse. accessibility: the doctors surgeries are full, there is a shortage of nhs dentist. The schools are

over subscribed. The local hospitals are struggling, appointments are many months of waiting, how are the local services going to cope with the increased footfall? green belt: the green belt should be protected at all costs, the idea of green belt was to create green space between towns for the use of the residents. If this massive development is allowed to go ahead there will be no natural boundary between brighthouse and CLIFTON, a garden suburb is just a word created to make the development sound more appealing. The council should have to develop brown sites first and only use green belt as an absolute last resort. the scale of this development is disproportionate to the whole of calderdale, new housing should be spread out throughout the borough providing new homes in all areas.

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

Duty to Co-operate Reason:

there does not seem to be any evidence of cooperation between calderdale, Kirklees and brAdford. Kirklees are planning a further large development just adjacent to the calderdale boundary. The traffic from that will have to also pass through brighthouse if they require access to the m62.

Suggested Modifications:

The local plan should be more evenly spread throughout calderdale.

Additional Evidence Link:

Comment ID **APX317**

Site ref (if applicable): **LP1463**

Person ID: **1128531**

Name: **Miss Katy Cranston**

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 am emailing to voice my severe concerns over the applications of the proposed dwellings and Business enterprise planned for our local village. I am a fairly recent member of the community and I am getting to grips with how the community works. We have just about managed to get neighbourhood watch system in place due to reduced policing, we have had to police the streets, taking it in turns to be out and cover the nights to make ourselves seen and ward away the burglars of which targetted my home a year ago now. I fear that making the village bigger will have a negative impact and will be too far for locals to police. Where will the additional actual police for this be coming from?! Water... don't get me started on water. The roads are shot to bits. I spoke to a very official looking gentleman who was helping to sort out the disaster of a water system out. He went on to explain how dreadful our village is for water supply and the amount of money would never be found to repair properly or replace it all especially not if new houses are to come along and add to this. He said the money is NOT in the budget and we had to voice our concerns. He also said that the road surfaces are not strong enough to hold the volume of traffic it sees down Clifton Common. I am really worried about the school my child attends. All it takes now is for the motorway to close or back up and the traffic is redirected passed St John's at Clifton. It is so connected as it is. How will such little roads cope with extra traffic? Where will the children go to school? So many schools in area are

over subscribed? The land behind my house should not be able to be built on. I had to fight to purchase my house because the coal searches came back inconclusive. A specialist mining company wouldn't authorise my mortgage and that is on an existing house! I fear what will happen if land is messed around with, what could happen to our houses? There is the abundance of wildlife that inhabits the fields of Thornhills. Deer, badgers, foxes. We see them frequently. I have a dreadful feeling that they will be hunted just to assist the planning process. There are eyes on the fields at all time. What is the future of what I know call home? What benefit will Calderdale have to spoiling one of its only areas it can be proud of? Clifton doesn't deserve to be a rat run. It is a village that has a successful Community Village Association, an oversubscribed school and a good reputation. Please don't take this away from me or my family for the future.

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 **APX318**

Site ref (if applicable): **LP1463**

Person ID: **1120427**

Name: **Mrs Hazel 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:

I wish to challenge and object to the current Calderdale Local Plan on the basis of it being sound in terms of delivering a sustainable vision for the Borough. The fundamental concern is about the disproportionate level of housing development and resultant density of proposed dwellings proposed in the Clifton area "" the so called Thornhills Garden Suburb. (LP1463) I wish to do so in term of both the process of developing the Local Plan (and its ability to properly engage with and represent the views of the local communities); and also on the lack of justification and evidence used to support some of the proposals and recommendations. First in relation to the process followed I wish to make the following points: The Council insisted that Clifton Neighbourhood Village Forum would only be considered as a formal planning forum if the area (and therefore residents) of Thornhills were removed from its membership. This is in direct contradiction with NPPF which sets out the importance of community engagement. This is the area of Calderdale most affected by the current development proposals and I fail to understand the Council's reluctance to formally engage with local residents in this way. There were a large number of comments and concerns voiced over these proposals in the original Draft (summer 2017). Since that time, Government targets for proposed housing allocations have changed and been reduced. However this change has only altered allocations in other parts of the Borough. Allocations for the Brighouse and Rastrick area have remained and are now even more disproportionate. half of the housing allocation for the entire Borough is focussed on the Brighouse and Rastrick area and approx. a third on the two'Garden

Suburbs' "" including that in the Clifton area. There is very little evidence, in spite of claims to the contrary, that any of the views expressed in response to the Draft have been taken into account in the final version of the Plan "" nor has there been a conscious effort by the Council to engage positively with this community. Many issues and questions were raised as part of the initial consultation which have not been resolved in the final draft (I will cover some of these in the following points). The debate by the Council when they chose to recommend the Plan was partisan and reflected local loyalties rather than taking the necessary strategic view of the needs of the Borough as a whole. This is evidenced by witnessed discussions supported by web cam: https://calderdale.public-i.tv/core/portal/webcast_interactive/358771 and eg local paper article by local member stating effectively that there would be less upset overall if all the development was focussed in one part of the valley: <https://www.brighthousecho.co.uk/news/independent-councillor-colin-raistrick-why-i-voted-yes-on-calderdale-s-local-plan-1-9224532> Whilst local councillors are of course focussed on their direct electorate, they are also paid for from the council tax levied across the Borough and should be capable of demonstrating a degree of strategic analysis and debate for the benefit of the whole of Calderdale. Both the consultation on the Draft Plan and this latter consultation have been timed to coincide with the summer holidays, both running into September. This has made it additionally difficult for local people to be up to speed with how to comment and for them to engage with the process. The process for making representations for both consultation exercises have been very difficult, time consuming and confusing "" hence my resorting this time to setting out my concerns in Appendix 1. There is little evidence of effective collaboration and cooperation between Calderdale and Kirklees in terms of their planning and development of Local Plans. This is evidenced by the fact that neither takes account of the potential cumulative development of either residential development or potential associated infrastructure contained within said plans in terms of their potential impact on the area "" potentially a total of c 5000 dwellings within a limited distance from each other. Secondly in relation to justification and evidence I wish to make the following points: Fundamentally the Plan fails to set out (other than in name) any detail or reassurance that the planned 'Garden Suburb' will meet the criteria and definition of such. There is little evidence of a meaningful and effective network of open spaces and green corridors, and the density of housing [see ref above] proposed for this site is in direct contradiction to a vision of a garden suburb which demands 'more open space and natural areas' |.. more tree planting and landscaping, and creation of a green and leafy character'. Specifically and disappointingly the current plan, far from promising enhanced natural character, actually proposes destroying a number of popular green corridors/amenity spaces and public rights of way that are already widely used and enjoyed by local people "" on foot and often on bicycles "" eg Thornhills Beck Lane, along Thornhills Lane and back into Brighthouse via either Clifton Common and/or the Calderdale Way "" a well-used and widely recognised regional route which is an important part of the public rights of way network within the Borough. The plan does not recognise the importance of local greenspace for the health and wellbeing of local residents who we know mostly (75%) enjoy the natural environment within 2 miles of home [1] . Defra has clear policy drivers (25 Year Environment Plan) setting out the importance of ensuring that there are opportunities for greater connectedness with the natural environment and the Dept for Health are increasingly encouraging waling as a realistic and achievable exercise for target populations. The current Local Plan draft fails to acknowledge or embrace these policy drivers in a way that offers opportunity for all residents in an equitable way given the proposed vast degradation in landscape character and local amenity resulting from the developments focussed on Clifton and Brighthouse. The area of Greenbelt which is proposed to be removed in order for this vast and disproportionate development has been identified in the Council's own Greenbelt Review as of high sensitivity. Guidance states that Greenbelt should only be released under 'exceptional circumstances'. There is no sense in the current plan of any real positive planning for either development or protection of the remaining greenspace for existing and future generations of Clifton residents "" focussing only on the protected areas in the west of the Borough. This alongside the evidence contained in table 6.11 of the current plan which shows the disproportionate amount of land proposed to be taken out of greenbelt (as compared to other areas across the Borough) to support the

development of the Enterprise Zone in Clifton, clearly demonstrates the iniquitous impact of the proposed plan on the residents of and local visitors to this area of Calderdale. Ecological impact "" the plan (rightly) places emphasis on protecting the national and internationally important sites in the west of the borough. However it fails to set out convincing evidence about the ecological impact of siting c.half of the proposed new dwellings in the Brighouse and Rastrick area rather than a distribution that is more equitable across the Borough. It states that there is insufficient ecological information to identify the impact of development of the site. Current conservation and environmental policies recognise the value of local greenspaces in creating crucial corridors between protected sites in addition to protection of the protected sites themselves [2] . The current plan makes no provision for this kind of thinking or in any way recognises the value of the current area in terms of UK BAP species etc. Air quality "" the plan makes no provision for how to ensure that there is no deterioration in air quality resulting from the additional vehicles which will use local roads from both the large number of additional houses and the Employment Zone. As Calderdale has already failed to meet air quality targets, I would expect that demonstrating effective mitigation would have been an essential part of the Local Plan and/or condition of its eventual approval. Calderdale has challenging targets for allocating new sites for housing and makes a statement about the needs for affordable housing particularly for elderly residents and for young people. However the plan "" particularly for the new garden suburb "" provides little reassurance that this development will indeed include the much needed affordable housing as oppose to being driven by developers to build larger and potentially more profitable properties. If the justification for such a development is the expectation of the need for affordable housing, then the plan should contain some explanation of how this will be delivered. A recent CPRE report has looked at housing allocations across the county on former greenbelt sites and shows that only 22% of those already granted planning permission are actually'accessible'. If the housing allocations were more equitably spaced out around the Borough other local communities around Calderdale would benefit from greater availability of housing stock and this would reduce the need to remove such a large area of Greenbelt in and around Brighouse. Lack of infrastructure "" the additional c.5000 houses across the Brighouse and Kirklees area and the development of 2000 in the Clifton area alone will fundamentally change the character of the local area. The plan acknowledges that this development may have to start later in the planning period due to the fact that the infrastructure isn't in place. The Highways' Agency response to the initial Draft Plan states that there will be a cumulative impact of the current recommendations that make it unlikely that there will be capacity on the current roads and infrastructure. Local residents are acutely aware of the traffic problems in and around Brighouse at the current time. Any proposals for new infrastructure that merely redistribute traffic ultimately to the same hot spots will fail to address the fundamental issues and challenges of developing a sustainable transport solution. It seems irresponsible to be seeking approval for planning such a large scale development focussed on the far east of the borough without (as yet) sufficient detail, planning or implementation of the necessary infrastructure to support it. If the housing allocations were more equitably spaced out around the Borough "" this pressure would be reduced and other local communities around Calderdale would benefit from greater availability of housing stock. [1]

<http://publications.naturalengland.org.uk/file/5390691567403008> [2] In 2010 Professor John Lawton undertook a Review and the resulting publication on the Defra website'Making space for nature': a review of England's wildfire sites. Gov.uk talks about the need to look at all natural areas in terms of what they may be able to offer in terms of wildlife corridors "" connecting natural spaces and creating greater resilience for our wildlife "" particularly as we prepare for climate change.

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

Duty to Co-operate Reason:

Suggested Modifications:

Revisit the allocation of housing to Brighouse area and that for Clifton specifically to deliver a more

equitable distribution of new housing stock across the Borough and reduce the need to remove such a significant and locally valuable area of Greenbelt. Demonstrate greater awareness of and planning for the importance of local greenspaces to local communities. Work positively with local communities and local community forums when considering the detailed nature of any planned developments.

Additional Evidence Link:

Comment ID **APX335**

Site ref (if applicable): **LP1463**

Person ID: **1140275**

Name: **Margaret & John Newton**

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:

DISPROPORTIONATE Although recognizing the importance of the need for more housing I cannot understand the proposal passed by Calderdale Council to build 1998 houses in the area adjacent to Clifton Village as this is totally disproportionate as I believe Thornhills/Clifton are taking on around 48% of the total number of houses planned for the whole of the Borough whilst Thornhills/Clifton represent only 3.9% of the Calderdale land area. I believe that Calderdale Council have unfairly passed this proposal to build 2000 houses, this vast number of houses will result in the historic village of Clifton being engulfed and losing its heritage dating back to medieval times AIR QUALITY We have Pollution rates in the Brighouse /Clifton area already above National acceptable levels and therefore such development will only exacerbate the problem. What measures do Calderdale Council have in place to combat the unacceptable level of DIRTY AIR in the Brighouse area ? Bearing in mind that Calderdale are one of twenty three councils that have already failed to meet Air Quality targets. The increase in traffic in and around Brighouse will result in yet more car fumes etc and so have a detrimental impact on the health & well being of all residents and in particular children and the elderly. Air Pollution is particularly bad for us, penetrating deep into the lungs and cardiovascular system, causing diseases including stoke, heart disease, lung cancer and respiratory infections and so make a huge increase in hospitalization placing even more strain on a beleaguered NHS. The question also arises "" Are Calderdale Council pollution plans "Flawed" and "Unlawful"? Infrastructure Calderdale Council have not provided a clear and workable delivery plan. How do they propose to overcome the existing and increased traffic congestion? Regarding the number of houses planned is also another great concern as we will need the building of schools and provision of more Doctors, Dentists etc plus major improvements to the road network which is already under severe strain especially in the rush hour periods and/or when there are problems on the M62 Calderdale need to supply much more transparency and a workable plan RISK OF FLOODING The building of nearly 2000 houses on this green field site will surely make the possibility of flooding in Brighouse similar to what we suffered on

Boxing Day 2015 even more likely. What proposals do Calderdale Council have in place to ensure that flooding does not occur?

Additional Evidence Link:

Comment ID **APX357**

Site ref (if applicable): **LP1463**

Person ID: **1123710**

Name: **Mr Mike Ramsden**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

DISPROPORTIONATE In considering Calderdale as a whole, Brighouse has been allocated a disproportionate number of new houses and the only "Garden Suburbs" in the borough. Whilst nearby access to the M62 seems to have been a major factor in the decision, the Council has obviously conveniently "glossed over" the problems which such developments would bring. The current road systems are already unable to cope satisfactorily with traffic volumes, and when there are any nearby problems on the M62 the roads leading into and through the town are such that any progress just grinds to a halt. One can only imagine, based on current experience, the chaos which will ensue if some extra 4500 new houses are built in the town, 3200 of which are in the proposed Garden Suburbs. The Council seem to believe that building huge developments close to the town centre will encourage people to walk to work, but most people accept that Brighouse will be a dormitory town and that people will travel by car to all points of the compass from here. **AIR POLLUTION** Calderdale has not met its Air Quality targets and the likely addition of another 6500 cars (1.5 cars per household for the additional houses proposed for Brighouse) will only add to the burden and restrict any chances of future targets being met. **GREEN BELT** What has happened to the phrase "Green Belt"? It would appear that Calderdale's planners ignore this phrase and intend to swallow up and develop on Green Belt land in the Thornhills area, which if this proceeds will diametrically oppose its comments regarding safeguarding the countryside. If this development proceeds in its current form it will swallow up countryside, near to the town centre, which for generations has been used by walkers, runners, cyclists and horse riders. In addition, just imagine what effect that will also have on the habitats and existence of the abundant wildlife in the area. **INFRASTRUCTURE** Whilst promoting the idea of major "Garden Suburbs" Calderdale does not appear to have put forward any clear ideas or timescales for any necessary infrastructure developments which would be required to initiate their ideas. It would therefore be wrong to consider approval of developments of this magnitude without, or until, all the necessary supporting evidence has been provided.

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

Duty to Co-operate Reason:

It is difficult for a member of the public to know what co-operation has taken place with neighbouring authorities, but would expect this to be taken into consideration when examining the plans.

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX358**

Site ref (if applicable): **LP1463**

Person ID: **1182274**

Name: **Mr Alan 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:

1. The allocation of housing which is proposed for Brighouse in particular the Clifton area is very disproportional in relation to the rest of Calderdale. 2. Why is the Community Infrastructure Levy [C.I.L] so low for this area compared with other areas in Calderdale? This will certainly encourage developers to favour this area regardless of the extra traffic, potential flooding & lack of schooling. 3. The term "garden suburb" seems to imply that it supports open space & natural habitats yet how can that be when most of our greenbelt will be lost! Not to mention the extra air pollution with possibly an extra 3000 cars. 4. The population as a whole is living a lot longer so where is all the housing for these retired people going to be? Ideally they should be built nearer to Brighouse town centre on brownfield sites where public transport is easily accessible.

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 **APX359**

Site ref (if applicable): **LP1463**

Person ID: **1181946**

Name: **Ms Christine Barraclough**

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?: **No**

Sound Reason:

No. I believe this development would be detrimental to the area. Traffic flow, already heavy, would become unworkable. A wonderful green space would be lost - the Brighouse area is already overburdened with planned developments! Public transport serving the area is scant and inadequate. Being at quite a high elevation, this area routinely receives a large amount of snow in winter, which would affect access to it, especially from Brighouse. Wildlife abounds in the area - the development would cause this to be lost. This area is an asset to the community as it is.

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 **APX364**

Site ref (if applicable): **LP1463**

Person ID: **717649**

Name: **Mr Alan Roberts**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

This proposal is not legally compliant as inaccurate information has been used and relied on to come to an erroneous conclusion, C.C. were made aware of this but have ignored warnings and pushed ahead regardless.

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

Sound Reason:

The 'Plan' fails to take into account impacts on the community as a whole, it has not demonstrated any plans to get to grips with the infrastructure problems that plague Brighouse and will only be exacerbated should the plan go ahead in its present form.

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

Duty to Co-operate Reason:

Questions put to C.C. that are fundamental to the plan have not been answered but totally ignored, these questions apply to the actual basis and assumptions made by C.C. They have not taken into account the impact of Kirklees developments on the South side of the M62 that will also have a detrimental effect on Brighouse. It's as if C.C. have said to Kirklees "you do what you want and we will do what we want and never mind the consequences". Little duty to co-operate there.

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX371**

Site ref (if applicable): **LP1463**

Person ID: **1125716**

Name: **Mrs Julie Davis**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The Council has a legal obligation to engage the community in the proposals for the plan. Given that the Brighouse area is expected to shoulder a huge proportion of the new housing along with a new business park, the level of engagement of the community by the Council has been completely inadequate. Public meetings were held, but these were not widely advertised and it cannot be a coincidence that both this Plan and the 2017 version were made available for comment by the public during August when a large proportion of the community were away on holiday. The legal obligation to engage with the public must surely also include an obligation to take the views of those consulted into consideration. Lord Woolf in the case of R v NE Devon HA (2001) specified that in order for proper consultation to be deemed to have taken place, "the product of consultation must be conscientiously taken into account when the ultimate decision is taken". When the Council consulted with the public in 2017, the product of that consultation was over 9,000 comments with many of those relating to this site and the other Brighouse garden suburb. The fact that there have been virtually no changes made to the Publication Draft despite the huge number of objections proves that the Council has not 'conscientiously taken [them] into account when the ultimate decision is taken'. In addition, para 182 of the National Planning Policy Framework makes it clear that consideration of reasonable alternatives is a key part of the planning process. It is for the above reasons that it is my view that the Local Plan is not legally compliant.

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

Sound Reason:

The first test of soundness is whether the Plan has been 'positively prepared'. This particular proposal for almost 2,000 houses will swamp the existing communities in Thornhills and Clifton. The eastern end of the borough is already over-developed and in para 2.1 of the Plan the Council admits that 80% of Calderdale inhabitants currently live in the eastern third of the borough. Rather than seeking to achieve sustainable development by utilising brownfield sites and unoccupied housing, of which there is approximately 3,000 according to the most recent census, the Council has instead opted for the easy (some may say lazy) solution of finding a large area of greenbelt and plonking a 'Garden Suburb' on it. The Council needed a quick and easy solution because of its procrastination in developing the Plan, as a result of which it found itself up against the Central Government deadline. This is no basis for making a sound decision. The Council itself has identified many serious constraints in connection with this site. These constraints include: Flooding - Brighouse has suffered serious flooding in recent years. To contemplate building 2,000 houses and a business park on greenbelt land above Brighouse which currently is covered by fields, hedges and trees acting as a natural flood defence, seems foolhardy in the extreme. Highways - this area of the borough is frequently gridlocked. This is happening now on a daily basis on Clifton Common and other roads in the Brighouse area and that is before an extra 4,000 plus cars arrive into the area. Highways England has expressed concern about the scale of development proposed around the Brighouse area and in neighbouring Kirklees. Many of these vehicles will want to join the motorway at J25 and will inevitably use the roads through Clifton to do so. The implications for road safety in the village, particularly the safety of the children attending St John's Primary Academy is of great concern and the Council has failed to address these in any way in the Plan. Ecology - much has been written about the loss of mixed deciduous woodland on this site together with species rich grassland both of which provide valuable habitat for rare

greenfinches, tree sparrow and bats. There is insufficient evidence in the Plan to show how the Council proposes to overcome these constraints. Indeed there is no evidence to show that the Council has taken any of the comments made in 2017 on protecting the ecology of this site seriously. Instead it states that there is insufficient ecological information to identify the impact of development of the site. Surely it is irresponsible in the extreme to continue with the plan to develop an area where this information is unknown. Pollution - research shows that air pollution is the largest environmental risk factor linked to deaths in England. Dangerous levels of air pollution are putting people at greater risk of heart attacks, strokes and asthma attacks. A very recent study carried out in China has also found a link between exposure to air pollution and reduced cognitive performance. Para 13.4 of the Plan acknowledges that large areas of the Brighouse area are Air Quality Management Areas and as such already exceed nationally agreed levels of pollutants. Add into the equation an extra 4,000 plus vehicles in the area and the very serious threat to health caused by poor air quality can only get worse. Has the Council included measures in the Plan to mitigate these concerns? Its proposals are to make live data available and to explore novel and emerging technologies. These vague proposals do nothing to reassure those of us breathing in the toxic air on a daily basis. In order for the Plan to be sound, it has to be 'justified', that is 'the most appropriate strategy, when considered against the reasonable alternatives'. I strongly feel that the Plan is not sound for the following reasons: The decision to include site LP1463 has been shaped more by the political landscape of Calderdale Council rather than by it fulfilling its duty to follow the most appropriate strategy and so ensuring the protection of the physical landscape, that is our greenbelt. The Council has always defended its plans for the Garden Suburb by claiming it is only doing what has been forced on it by Central Government. Some may say this is because the Council is Labour led while Central Government is Conservative led which immediately makes the decision to build on this site political. Councillor Raistrick (Independent councillor Hipperholme and Lightcliffe) is on record in the Halifax Courier 29th June 2018 as saying that the original proposal for his ward to be allocated well over 1,000 houses "is plainly ridiculous given the traffic constraints". His comments have been taken on board and in the final version of the Plan he states "we get less than a quarter of that. Not a bad deal for my ward". He continues, "What this plan now means is that Clifton and Raistrick are going to get a lot of houses. A lot..... It's a shame that politics gets in the way of big decisions". Well said Cllr Raistrick! Also in the Courier on 10th February 2018 he discusses the Full Council meeting and of the Local Plan he says, "I learned a new phrase, 'the Southeast Calderdale strategy'. I'm sure the administration feels this is a nicer phrase than the 'completely concrete over Clifton Strategy'". Politics has clearly been the winner in the drafting of the Plan with the losers being the current and future residents of Southeast Calderdale who will forever have to live with the consequences of the current political in-fighting. Finally I must refer to LP1461. This is a smaller greenfield site of 80.54 ha when compared with the Thornhills greenfield site of 111.02 ha. However, the residential capacity of the smaller site is for 2,416 houses compared to 1,998 for Thornhills. So you would think this would be a win/win site; less destruction of greenfield land and more (presumably affordable) housing. They have almost identical RAG assessments but Thornhills has many more serious constraints which would require mitigation. Site LP1461 is not on the final Plan, nor is it to be found on the Initial Draft Plan 2017. Why is this? LP1461 was one of the sites filtered out before publication of the Draft Plan so was never included in Calderdale's plan. It is very interesting to note that this site is in Illingworth which is the ward of Deputy Leader Barry Collins. Cllr Collins has been very vocal in his support of the development around Brighouse and must be very relieved that the Council decided to filter out the site for a potential 2,416 houses in his ward. In conclusion, the decision to include Site LP1463, euphemistically called Thornhills Garden Suburb, in the Plan is not sound as the above points demonstrate that the Plan has not been positively prepared, is not justified, is not effective and is not consistent with national policy particularly where building on Green Belt is concerned. The Council has not shown that it has fully explored other options such as greater use of brownfield sites and a more equitable distribution of development throughout the borough.

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

Duty to Co-operate Reason:

One of the biggest issues with this site is the chronic impact it will have on the existing infrastructure which is already at breaking point. This site and the proposed business park in Clifton are very close to the border with Kirklees Local Authority. The proposed developments in Kirklees in addition to those in and around Clifton and Brighouse are going to have a huge impact on the road infrastructure and the already poor air quality. The Plan does not show how these two authorities have worked together to develop deliverable solutions to these issues.

Suggested Modifications:

The comments made during the Regulation 18 process should be fully reviewed and the Council should be required to modify the Plan. This site should have been rejected at the filtering stage as it clearly meets the same 'showstoppers' as LP1461 met: Flooding, Highways and Ecology. Alternative sites should be found amongst the many brownfield sites in the borough and use made of the thousands of unoccupied houses.

Additional Evidence Link:

Comment ID **APX386**

Site ref (if applicable): **LP1463**

Person ID: **1181617**

Name: **Miss Allison Rushton**

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:

Infrastructure The current draft plan appears to be unsound as it does not sufficiently address the infrastructure needs of the village of Clifton and the surrounding areas including Thornhills, if the proposed 'garden village' proceeds. The local school is already greatly over subscribed The proposed location of two new schools is completely impractical because access would be via a single track road which is simply not suitable for this level of development The local health and dental provision are already over stretched and no dentists in the area are taking on new NHS patients The growth in population in this area would need further provision for play areas etc (especially as the proposed development will destroy the existing green belt area). The small play area in the village has been awaiting repairs for a considerable period and we have been told that there are over 100 similar playground ahead of it on the waiting list so how will this aspect be addressed? The proposed development will cause a huge amount of extra traffic in a village that currently experiences congestion and the consequences of the existing pollution The plan proposes major developments where infrastructure is entirely lacking and unplanned/no committed, without any clear or up to date infrastructure delivery plan. This has not changed from the original draft. How is the council going to improve traffic congestion? A proposed new junction 24a for the M62 is show in the plan. Highways England have stated that they will not fund this junction but the draft plan suggests that funding will come from Highways England they will work in partnership with Calderdale on this aspect. How can Calderdale include such comments in the draft plan which are clearly incorrect and not sound? How does Calderdale propose to obtain the necessary funding for a new junction? How long will it take to obtain this given that reducing, rather than increasing it is vital to both Brighouse and the wider

area. Given that Brighouse provides a main access route to Kirkless and Bradford, its traffic issues cannot be considered in isolation. The easy transition of traffic between these points is important to ensure that pollution is reduced. The local plan has not shown how Calderdale has worked with Kirklees and Bradford on this aspect. The proposal to build both residential and commercial premises in the area will have an impact on the run off of surface water. What plans are proposed to deal with this in light of the flooding experienced by the Calder Valley in recent years? Air Quality The air quality in this area is already of concern and will worsen if the proposed residential and commercial developments proceed as outlined. Calderdale is 1 of 23 local authorities in England that have not met their air quality targets. Despite this the proposal is to build 4000 homes and an Employment Zone in an air quality management zone. How does the Council propose to manage the resulting increase in vehicle emission? There is a proven and accepted correlation between poor air quality and adverse health impacts. How does the Council intend to mitigate this in light of the development proposed for the Brighouse area? The Council's report on air quality has identified 7 air quality management areas, one of which is Brighouse. In addition, DEFRA's report on air quality specifically mentions the A644 Wakefield Road from Brighouse via junction 25 of the M62 to Cooper Bridge (monitoring in December 2015) showed national average levels of NO2 of between 40 and 60 micro grams per cubic meter Disproportionate Amount of Housing Development in Brighouse and Clifton Areas The amount of housing development proposed for the Clifton and Brighouse areas is completely dis-proportionate to the size of the existing population when compared to other areas in Calderdale In the Clifton area a 'garden village' is proposed. A garden suburb has a specific definition. Amongst other things the definition requires that a garden suburb provides more open space and natural areas that can support biodiversity and allow for more tree planting and landscaping. How does the plan protect and support the biodiversity? The plan shows the following constraints; ecology (river and lowland mixed deciduous woodland to the south of the site both UK BAP priority habitats; species rich semi-improved grasslands in the south central area and a short section of dis-used railway to the north east fall within the Wildlife Habitat Network). There does not appear to be sufficient information in the plan to overcome this constraint. In addition, there are rare Green Finches in this area. How does the Council propose to protect these? The definition of a garden suburb includes the need to take a comprehensive and integrated approach to development including all the facilities and services needed to support a new community. The plan does not appear to address this fully as no new infrastructure appears to be planned in terms of health care services and additional public transport.

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 **APX387**

Site ref (if applicable): **LP1463**

Person ID: **1104199**

Name: **Mr James Forester**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Maybe complies legally but not in the spirit of the law. The council have made it very difficult for non

computer literate residents to make representations. Despite claims of the council that the consultation has influenced site policies etc, it would appear the feedback they have received from the consultation has led to no changes. In fact it would appear the feedback has been totally ignored and none of the issues raised addressed. No doubt the consultation was just to tick the box on compliance but if all the issues raised are ignored, what's the point. A further point is the council's attempt to ride roughshod over the local residents. The exclusion of the residents most affected i.e. the residents of Thornhills from the Clifton Neighbourhood Planning Forum by arbitrarily redrawing the boundaries of Clifton and changing the name from Clifton Garden Suburbs, shameful.

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

Sound Reason:

The Community Infrastructure Levy (CIL) at £40 for this site would appear to be an incentive to developers to use this area. How has the council arrived at this rate considering the massive amount of infrastructure required in this development. It seems ridiculous when Hebden Bridge as a levy of £85, how has the council arrived at this differential of rates. Will this CIL be ring fenced and used solely for infrastructure in this development or will it be used in other areas of the council authority. How are the council going to meet the increased demand for School places, health services i.e. doctors, dentists hospitals which are already under severe pressure from the needs of the existing population. The road system is inadequate for the present volume of traffic, there doesn't appear to be any real plan to provide the road infrastructure to resolve the present issues. The traffic in this area is already horrendous how can building around 2000 homes which will add around 4000 cars to the mix not have a profound detrimental effect on air quality. With an extra 6000 houses in the Brighouse area, say 12000 cars without major infrastructure investment in the road system congestion and sky high air pollution is a given. Calderdale has so far failed to meet air quality targets, so this increase in traffic can only have a negative effect on the council's performance. This at a time when new evidence is coming to light, about the profound negative effect of air pollution on the population, especially children. The plan to build a road at the top of Wellholme Park to encircle the park with pollution seems also flawed. The council in its own assessment report identifies the lack of data available to assess the impact on the ecology of the site. Several birds on the Red List use this site Curlew, Lapwings, Tree Sparrow, Fieldfare, Redwing, Mistle Thrush, Song Thrush, Starlings along with Little Owls and many other species of fauna and flora. The Greenbelt review identifies this area as one of high sensitivity. The council acknowledges the importance of greenbelt and extolls the virtue of protecting it. Yet then illogically decides to build thousands of houses completely destroying this greenbelt. A garden suburb as defined should provide open spaces and natural areas that can support biodiversity with more tree planting and allow rainwater to infiltrate naturally. Seems we have that area already so why destroy it and concrete it over. Ignoring the options of a small development and building houses elsewhere in the council area there is no proportionality in this plan. Quod erat demonstrandum.

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

Duty to Co-operate Reason:

To the best of my knowledge there has been little or no co-operation with Kirklees on the impact that the LDP's of each council will have on this area. As both council's plans have such a significant impact on the area up to the council boundaries which will have a massive increase of pressure on the infrastructure in this area. Consequentially it is hard to believe that there has been any meaningful discussions between the councils.

Suggested Modifications:

The plan is completely disproportional, with Brighouse bearing the brunt of the council's additional housing

plan. With the village of Clifton almost doubling in size, destroying the Historic village. The plan should impact equally in the council area, not mostly in one area. How can the council inflict this massive increase in air pollution on to its residents, while being one of the few councils to meet air quality standards. Is there scope for future legal action against the council for inflicting bad health on to the residents of this area. With such a massive proposed increase in population in this area the council should publish the plan for increased schools, doctors, dentists, hospitals & road infrastructure. The afore mentioned infrastructure is already creaking under the present load. The infrastructure is entirely lacking and unplanned with no commitment to deliver. How is the council going to improve traffic congestion.

Additional Evidence Link:

Comment ID **APX419**

Site ref (if applicable): **LP1463**

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 requirement for Heritage Impact Assessment on close Listed buildings& undesignated heritage assets, in Reports Required section, to supplement the pre-determination archaeological evaluation mentioned, to comply with the 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 **APX470**

Site ref (if applicable): **LP1463**

Person ID: **1104200**

Name: **Mrs Jennifer Rowlands**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

This plan for 2000 is on top grade green belt. The prime minister promised to protect green belt for the good for the community yet the council is proposing to build a massive development on green belt. It has not detailed any plans to protect the existing delicate balance of wildlife and habitat. The rare species of bats and birds need protecting. Once the green belt has gone it cannot be remedied.

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

Sound Reason:

The impact of building 2000 in the CLIFTON area on the already stressed road structure in Brighouse will bring the whole town to a standstill. Brighouse is situated in a basin with only two main roads through the town. This cannot be remedied as the river and canal cause constraints. The extra cars generated from such a development, fighting against the extra traffic from the wood house and Bradley developments is just ludicrous and cannot possible coexist. Brighouse cannot cope as it is, the roads are snarled up at all peaks times, how does the council propose to remedy this problem? Air quality is a big worry to me. Calderdale is one of the named. Ouncils in Great Britain that does not meet the governments standard. As a person who has suffered a lung condition only last year I am deep,y concerned about the impact on our air quality by the building of so many houses in Brighouse. I am concerned for my own health and that of my children and grandchildren the council seems to have made no steps to reduce the already high levels of pollution,the idea that people will walk or cycle more is hard to swallow when faced with breathing difficulties and a 1 in 10 hill! The site is an area of previous mining and in many places is unstable the ancient hedgerows are beautiful to view in spring and summer and lots of people enjoy the walks and surrounding views from the Thornhills lane area.there are horse riders, walkers, cyclists and bird watchers who populate the area on a regular basis. This area of outstanding beauty should be protected for future generations. the town of Brighouse is at increased risk of flooding if these green fields are built on. The ford at Welhome rises very quickly as it is after a heavy shower of rain, the run off from such a development will increase that risk, what plans have Calderdale to protect Brighouse from flooding? why has Calderdale decided to give Brighouse 48% of the new housing when the town itself is so small in comparison to Halifax? The brown field sites should be used before valuable green belt is used

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

Duty to Co-operate Reason:

The council has made it as difficult as possible for people to comment on this plan. The website and portal in a mine filed of jargon, not easy to follow for the layman. Not all people have access to the internet and there is no indication thAt people can actually submit objections in letter form.

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX486**

Site ref (if applicable): **LP1463**

Person ID: **1116138**

Name: **Mr Gary Micklethwaite**

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:

AIR QUALITY - There is no doubt that increased traffic flow and reduced green belt land will result in higher NOx and Co2 emission levels. Brighouse is supposed to be in an air quality management area, but little sign of any action, demonstrated by allowing yet another supermarket to build on this tiny ring road. (3 in less than ½ mile.) CLIFTON - The A643 Clifton Common road is now busy all day long, with long queues at rush hour and school times. Vehicles park on both sides of this road making it dangerous and difficult for pedestrians to cross or cyclists to use. BRIGHOUSE RING ROAD - The multitude of traffic lights and roundabouts around the town over a ½ mile distance make the free flow of traffic very difficult. Especially, as we get high numbers of large vehicles trying to negotiate the tight turns and lane changes. M62 "Wakefield Road queues from the motorway are always lengthy and create high air pollution. The proximity of the M62 Junction 25 adds to all traffic problems. Brighouse has become a short cut for drivers from other towns to get to and from this junction. Frequent accidents and delays on the motorway encourage drivers to exit through Brighouse to circle around the M62 problems. PLANNING - New road planning and building should be carried out way ahead of homes construction on this scale. This is clearly not envisaged any time soon, and we suspect nothing useful will never be implemented. GREEN BELT - This is the last of the GREEN BELT land on this side of Brighouse and loss of this will seriously impact on all local residents' quality of life. We believe it is seen as an easy area to build on, and being close to M62 will make houses easy to sell to families coming from out of the area. These houses are not being built for local people. FLOODING - The land earmarked is all on high ground above the town, raising fears of flooding, as the water table is high enough to create numerous springs. During the use for coal mining 100 years ago, there were 13 water pumping stations in that area to free the mines of constant flooding. (Hebden Bridge flooding is soon forgotten it seems) VILLAGE LIFE - It is not fair on a relatively small village population to take on board a huge influx of housing on this scale, and it is totally disproportionate with housing plans in much bigger areas of the authority. High levels of construction traffic will impact greatly on the area roads. Few local jobs will be created as large national builders will get the contract. SUMMARY - Any increase in housing in the Clifton area will have severe repercussions for the whole of Brighouse, and result in much longer traffic delays, and much poorer air quality. The increased adverse medical conditions will impact on the town and leave a tainted legacy that should shame us all. The building process itself would present huge problems to the area and create much greater levels of danger on already dangerous roads, for motorists, cyclists and pedestrians.

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

Duty to Co-operate Reason:

If Calderdale Council have cooperated with other councils then they have totally ignored Kirklees Council's proposals to build large scale housing on the other side of the council boundary, less than 2 miles from their proposed development. Both developments would result in high volumes of commuter traffic accessing the M62 at Junction 25. This junction is already congested and there are no viable alternatives without greatly affecting other major roads in the area. This appears to be a case of pushing unwanted developments to the far reaches of the council area where it will do least damage at the polling station.

Suggested Modifications:

The high cost of huge road modifications needed will make the whole project financially ridiculous. The cost of a new M62 exit and road infrastructure supporting this and connecting local towns, would be extreme as most of the necessary land is already built on. Any new road built in the area will necessitate further development as it will lead to moving bottlenecks somewhere else.

Additional Evidence Link:

Comment ID **APX511**

Site ref (if applicable): **LP1463**

Person ID: **1128619**

Name: **Dr Stephen Featherstone**

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 express my grave concern about the developments proposed. Has calderdale council assessed if there is capacity in our general practice services to accept new registrations associated with these developments? I do not think there will be enough gp's/nurses/district nurses in the local area to accommodate such a development .

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 **APX512**

Site ref (if applicable): **LP1463**

Person ID: **1182559**

Name: **Mrs Alison Haley**

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?: **No**

Sound Reason:

I object to the proposed building of properties in the Thornhills Lane green belt area of Clifton and in Rastrick. I have friends and we often enjoy walks around the area of Thornhills Lane and surrounding countryside. This green belt should be protected and preserved for the enjoyment of the residents of our small town, both now and in future generations. Furthermore, the wildlife should be preserved and protected. The whole proposal for building in the Brighouse area, specifically Clifton and Rastrick, is disproportionate to the size of Brighouse compared to the size, (and availability of building land) of other towns in Calderdale, such as Halifax. I am also concerned about the increase in traffic, when Brighouse is

already often gridlocked, particularly in rush hour and school start and finish times. And, of course, any incident on the M62 exacerbates the chaos. I frequently find myself in a queue from the end of my street right into Brighouse.

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 **APX513**

Site ref (if applicable): **LP1463**

Person ID: **1164799**

Name: **Mr Stephen Webster**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The proposed site is Greenbelt and should remain as such. What was the reasoning behind the councils decision to not allow the residents of Thornhills Hamlet to become members of the Clifton Forum, surely we are the ones who will be the most effected by this proposal.

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

Sound Reason:

GREEN BELT, this site is recognised and has been documented as as being a HIGHLY SENSITIVE AREA and is the last area south east of Brighouse to prevent the merging of URBAN SPRAWL with neighbouring councils Kirklees and Bradford. ENVIRONMENT, the area of Clifton and Brighouse already exceed the recommended levels of air pollution quality as set by the governmental guidelines, how could a potential of 6,000 more cars help to reduce this? FLOODING, the fields above Thornhills are regularly flooded and retain standing water for many weeks after prolonged periods of rain. The park (Wellhome park) is also flooded for long periods as well. One of the access roads, Thornhills Beck Lane/Jayhouse Lane requires the crossing of a ford through Clifton beck that is regularly flooded and not passable for long periods, the council are aware of this as they close the road and divert traffic through Thornhills Lane which is unsuitable for HGV's and is single track with blind corners and very few passing places. OPEN SPACE, the area is widely used by many people from Brighouse and places further afield,walkers,wildlife naturalists,bird watchers and cyclists to enjoy views and ambience of this area.The whole site has footpaths crossing the fields and are part of the Calderdale way and other well used walks of local interest. BIODIVERSITY, Apart from the abundance of wildlife such as deer,hares,stoats,weasels and a wide variety of bird species like buzzards,sparrow hawks,kestrels,gold crests,woodpeckers,jays and at least 3 types of owls and 2 types of Bats. there are a colony of tree sparrows one of only 2 sites in Calderdale and only there because of the special habitat they require there is also a group of curlews which are a much endangered species and are also there because of the specific habitat offered from this site. HIGHWAYS, Clifton Common to Brighouse is congested at peak times, this will only become worse with the addition of 4,000 extra cars. Highways England have already quoted that the number of extra vehicles from the site would not be sustainable and would have a serious impact on the existing infrastructure.

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

Duty to Co-operate Reason:

The fact that the council would not allow the Thornhills residents to become members of the Clifton Forum shows their lack of cooperation with its own ratepayers. There is no evidence that the Calderdale council have cooperation with Kirklees and Bradford councils as both these councils have large development sites in close proximity to J25 M62(Kirklees) and J26(Bradford), this would also increase the amount of traffic trying to pass through Brighouse or attempt to access the M62.

Suggested Modifications:

Spread the housing around the whole of Calderdale using the brown field and derelict areas.

Additional Evidence Link:

Comment ID **APX516**

Site ref (if applicable): **LP1463**

Person ID: **955301**

Name: **Barbara Ryan**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Do you consider the plan to be Sound?: **Yes**

Sound Reason:

After being against your initial proposed plan I now support "Calderdale Plan Publication Draft 2018" and support the Garden Suburbs plan for Brighouse.

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 **APX544**

Site ref (if applicable): **LP1463**

Person ID: **1058364**

Name: **Ms Tina Townsend-Greaves**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. The plan does not state how the Council propose to meet National Planning regulations, when the proposal is to carry out so much development in the area. Calderdale is one of the worst areas for air quality in England (Air Quality; Report on Court Action in Feb 2018) and is one of 23 Local Authorities in England that have not met their Air Quality targets. Yet they are proposing to build 4000 homes and an Employment Zone in an air quality management zone. How will the council achieve its targets when it has singularly failed to do so to date and how do they propose to manage the increase in vehicle emission that would result from the plan? The Council makes the following statement in its air quality strategy "“the principal challenges and barriers to implementation that the Council anticipates facing are developing novel solutions with limited financial and staffing resource' I question how it will be able to achieve this challenge with increased development? There is a proven correlation between poor air quality and adverse health impacts. How does the council intend to mitigate this, given the development that is going to take place in Clifton, which has a predominantly high ratio of older population? The plan should have regard to the planning guidance incorporated in the West Yorkshire Low Emission Strategy (WYLES) which is available to view on the council's internet site: www.calderdale.gov.uk/v2/businesses/pollution/air-quality/wyles-low-emissions-strategy . When calculating impact the latest Emission Tool Factor kit available should be used, if that supersedes the version stated in the guidance. The proportion of vehicle trips used in the plan analysis is somewhat lower than would be expected which would be at least 85%. The gradient of the site will also influence the number of persons who will be prepared to walk or cycle. Depending on this analysis, the plan should include a sensitivity assessment where most journeys are made by car. It has been assumed that the majority of vehicle trips will be distributed through the M62 j25 roundabout. This is based on gravity modelling work from 2004. The plan should include an updated analysis of traffic distribution, given the date of that work and because of the sensitivity of the A634/A644 junction and other junctions in Brighouse town centre. Where does the plan address the need to enable and support healthy lifestyles, i.e. local health and well-being needs "“ for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling? The plan actually builds over an existing large allotment space. The plan shows as a constraint contaminated land. The plan has not anticipated and addressed the natural hazards (in locations where large numbers of people are expected to congregate), viz. old and extensive mines and mine workings in the area for hundreds of years and it is not in possession of maps showing all the mine workings. Coal Authority records indicate that there are five recorded mine entries within, or within 20m, of the site boundary. The site is within an area of recorded and likely unrecorded coal workings at shallow depth together with thick coal seams which may also have been worked in the past. In addition, the site is within an area where coal has been removed by surface mining (opencast) methods. Any proposed plan should ensure that it is informed by the findings of intrusive site investigations, especially in relation to the mine entries recorded as being present and the potential locations of the highwall on the site. The Coal Authority are of the opinion that building over the top of, or in close proximity to, mine entries should be avoided wherever possible, even after they have been capped, in line with their policy:www.gov.uk/government/publications/building-on-or-within-the-influencing-distance-of-mine-entries. How will the Council alleviate this constraint, when it cannot fully understand the extent of these? Also home owners in the vicinity have had to undertake testing for Radon gas emission in the last 40 years. The plan makes no mention of this, leaving me to question what else have they not checked? A feature of the site over many years has been the regular run off of rainwater across it. If this occurs at a time when the site is fields and trees, it will be increased manifold when the land is built on. What steps are being taken to address this? Furthermore Clifton Common has had almost constant leaks and bursts from water pipes running underneath it throughout the dry spell, caused by land movement causing old pipe work to break. This has caused delays and problems for residents. If we can foresee dryer and hotter

weather in the future, how will the infrastructure cope with the additional demands on it and the additional (heavy) traffic travelling over it? Current Legislation (Development and Infrastructure Requirements) With regard to the Community Infrastructure Levy (CIL) why has Brighouse a levy of only £40 when it is important that the levy has a positive economic effect on development across a local plan area? Why have the Council decided to adopt an approach of using differential rates (in Hebden Bridge for example the rate is £85). How did the Council decide to set these differential rates, and did they undertake sampling to help them to estimate the boundaries for these differential rates? If this is the case, how did they decide on £40 per square metre for Brighouse? How this levy is calculated is an important point for the Public Inspector to consider. The Council needs to provide answers these questions as CIL is non-negotiable, so no CIL, no planning permission. Therefore any developer assessing viability has to prioritise CIL above any variable or negotiable costs. This means how this figure is set will have a profound effect upon the viability of the scheme. Given all the issues concerning infrastructure for Brighouse, has the Levy been deliberately set at an artificially low rate to encourage the developers, at the expense of roads, flooding and other facilities? The Council have to show that they has been robust in their approach to the calculation of the levy and to do this, the total cost of infrastructure it wishes to fund has to be shown. Furthermore, CIL can be used to fund infrastructure anywhere in an authority, so will the Council use this money in other parts of the Authority or to develop the infrastructure needed for the Employment Zone? The Plan proposes major developments where infrastructure is entirely lacking and unplanned / not committed, without any clear or up to date Infrastructure Delivery Plan. This has not changed from the original draft. How is the Council going to improve traffic congestion? The suggested 'ghost traffic island' proposed for the Clifton Common / Industrial Park junction is incompatible with the width of the road at the proposed site, and would compromise traffic using the junction with Cockwalk Farm Lane. A new junction for the M62 (24a) is shown in the local plan. It is suggested that funding will come from Highways England, working in partnership with CMBC and KMBC. There is no proposed date for completion (in fact, case, demand, risks and costs don't seem to have yet to be established) and given Highways England have said they will not fund this junction, how long will it take and how does the Council propose to get this funding? In the plan, provision of this junction is seen as critical to alleviating congestion in Brighouse and therefore to the plan.

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

Sound Reason:

I do not consider that the Local Plan is Sound , as "" It is not positively prepared. Its strategy does not meet objectively assessed development and infrastructure requirements, including the requirement to liaise with Kirklees and Bradford Authorities (where it is reasonable to do so and consistent with achieving sustainable development) which Calderdale have not done. It is not justified "" it is not the most appropriate strategy when considered against the reasonable alternatives (based on proportionate evidence) Green belt is being sacrificed to build an industrial park that is now needed as shown by the number of vacant industrial units within a 5 mile radius of the proposed site. It is not effective "" I don't consider that the plan is deliverable over its stated timescale, based on effective joint working on cross-boundary strategic priorities. It is not consistent with national policy as it does not deliver sustainable development in accordance with the policies in the Framework.

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

Duty to Co-operate Reason:

The road infrastructure in Calderdale cannot be taken in isolation, the developments in Kirklees and to a lesser extend in Braford will have an impact upon congestion and air quality in Brighouse. The local plan has not shown how Calderdale has worked with Kirklees in particular and Bradford on ensuring that traffic will move smoothly, thereby reducing pollution. There is nothing to show that there has been any co-

operation between Calderdale and Kirklees on the potential for the A62 at Cooper Bridge to exceed the EU limit Value for NO₂, nor for the major roadworks planned for the A644

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX556**

Site ref (if applicable): **LP1463**

Person ID: **1182157**

Name: **Mrs Jane Paolozzi**

Organisation:

Agent ID:

Name:

Organisation:

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 consider this Plan unsound due to numerous factors. Firstly, building a development of this size has huge implications to local wildlife. The infrastructure needed for such a site is so large that the impact on people and services would be greatly affected i.e. volumes of traffic, school capacities, and health services. Housing could not be provided in the timescale needed by this Local Plan; the disruption to the local community during construction would be unimaginable. Construction vehicles, and ancillary building materials and the length of time the work went on to provide such a vast amount of housing, is illogical. The development of smaller sites within the Borough, which are already available and much more suitable for developing local communities, would have much less impact on the surroundings, and provide housing where it is actually needed. This strategy would be less costly, less time consuming and much more sound.

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

Duty to Co-operate Reason:

Suggested Modifications:

The practical way to move forward with developing local areas, would be to return to the Spatial Planning Team's original proposal (2017 version) where smaller sites can be developed quickly and efficiently, requiring a lot less infrastructure and creating less disruption to local existing communities. The groundwork for smaller sites has already been researched, and these are available now. Many of the smaller sites have already had interested parties contacting the owners. Some of these smaller sites have had to be reduced in the 2018 Local Plan to accommodate Garden Suburbs. This seems absurd when the Highways Agency will need to develop major new roads for access to these developments.

Additional Evidence Link:

Comment ID **APX581**

Site ref (if applicable): **LP1463**

Person ID: **1182782** Name: **Mrs Judith Gilpin** Organisation:

Agent ID: Name: Organisation:

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 in the Kirklees Local Plan area. This plan is almost at an end. I now find that after having to fight against housing and employment sites in Kirklees, Mirfield, Batley and Spen areas, the citizens are now confronted with the Calderdale Local Plan, upon which the Garden Suburb of LP1463 will be on the edge of the Hightown and Liversedge area. How 2000 houses can be built on the edge of an already overcrowded area, with no extra schools, roads and doctors or bus routes is mind-boggling. This is also proposed to be on Class 1 green belt land. It is totally wrong. Brighouse is now at bursting point as regards road traffic. The position of a second supermarket - Lidl on the main road to the M62 motorway takes some beating, along with traffic going to Tesco Supermarket the road is at bursting point. How is the little very nice town of Brighouse going to cope? This is a Garden Suburb too far. I rest my case.

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 **APX586**

Site ref (if applicable): **LP1463**

Person ID: **1140261** Name: **Mrs Jen Clutterbuck** Organisation:

Agent ID: Name: Organisation:

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 of Green belt should be left alone, it is an utterly ridiculous idea to build so many houses on this land, destroying all the wildlife and habitats, trees and also enjoyment to so many residents myself and my family included!!! All the walking areas, all destroyed. Many of the wildlife such as hedgehogs and other animals are in decline, you will be contributing to this more. Think about all the traffic chaos which will be added to what is already a nightmare on the roads around here. How is it going to work. It's already a nightmare down Clifton common in a morning. People already drive like idiots through Clifton village and down the common when there is incidents on the m62, and during rush hour now, imagine what it will be

like with all the extra houses cars businesses it is just not good at all!!

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 **APX589**

Site ref (if applicable): **LP1463**

Person ID: **1130867**

Name: **Ms Sue Morgan**

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:

Proposed outcome of the site assessment: Do you agree with the proposed outcome of the site assessment? No Site assessments Highways Ecology Environmental Health Accessibility Highways There is already severe congestion at times on Wakefield Road and Highmoor Lane with a bottle neck at the mini roundabout at the bottom of Clifton Common. This is further severely compounded as soon as there is any problem on the nearby M62, which happens with increasing regularity. The recent opening of a new Lidl store so close to the mini roundabout has affected already congested roads. The proposed development will be catastrophic for traffic without major alterations to the roads in the vicinity. The plans for a Brighthouse by-pass are only at an early stage and the Clifton Neighbourhood Forum has already submitted detailed objections to the plans as they currently stand. Ecology The area for proposed development is currently open land which is home to many species of flora and fauna. This beautiful area is also used by dog walkers, ramblers, cyclists and others. It is land which the residents of Clifton cherish but the proposed development will obliterate this greenfield land forever. Environmental Health Recently there has been much in the news about the detrimental effects of pollution from traffic on people's health. I am concerned about the increased air pollution from increased traffic and household and industrial pollution, and the effects of these on the health of the local population. What will be the impact of a whole new sewage network on the existing Victorian one? The Local Plan needs to contain more detail on these issues. Accessibility We know little about any proposed infrastructure to support the new residents without increasing pressure on the services currently provided eg. doctors' surgeries, schools, chemists, dentists, libraries, parks, sports facilities, public transport etc. The Plan needs much more detail about infrastructure and how the process of upgrading the infrastructure will be financed and managed.

Additional comments Clifton is a small historic village, the character of which is preserved by the green land around it. The proposed plan will destroy the character of the village with huge detrimental effects for the current residents. The plan proposes to increase the population of Clifton enormously (and disproportionately to the rest of Calderdale). This increase is also grossly disproportionate to the size of the existing village. For this reason, and the reasons stated above, I strongly object to the planned proposal for my area. Alternative proposed use for this site. Open Space Please give your reason for alternative preferred use. As stated above.

Additional Evidence Link:

Comment ID **APX634**

Site ref (if applicable): **LP1463**

Person ID: **1137939**

Name: **Ms Jennifer Burkinshaw**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Public meetings on the consultation was not widely advertised; both times, in draft and currently and certainly not 'conscientiously' - as someone who mixes with a large proportion of the village socially and in terms of church and the CVCA, it has become painfully clear to me that many are not aware of the nightmare they are about to walk into in the new Garden suburb public meetings both last year and this were held at a time when many locals inhabitants were on holiday the method of commenting has been far too daunting for people who are not on-line, and so have less of an opportunity to view the plans, the 'constraints' Calderdale council have admitted on the draft plan but not adequately responded to and so to make sufficient comments to voice their concerns comments from the draft plan, with over 9000 comments in objection, have not been adequately responded to - no modifications made in relation to comments it has not been 'positively' prepared, with any alternatives offered The Clifton Forum were initially formally advised NOT to admit residents of the Thornhills area to their forum, only to be asked afterwards, when it was too late, why they had not included the Thornhills section of the village - the very people who are to have the 2000 houses build on their doorstep!

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

Sound Reason:

Air quality: Calderdale's is one of the poorest in England; already does not meet air quality targets; nothing in the council's 'response' to air quality as a constraint in the draft plan can even begin to answer how this can possibly improve when we add all these thousands of extra cars into the equation - which will only be exacerbated by an aging community in the area who will not be able to ascend the relatively steep hill. The extra traffic will add to the poor health of the local community, already 9% above the national average for heart and respiratory problems. noise levels - Clifton, even in Thornhills, which is further away from the M62 already suffers from high noise pollution - we can hear the traffic at most hours of the day and night. Infrastructure: nothing in the council's response to the comments on the draft plan has shown how the road structure would adequately cope with such a level of increased traffic. Already, many of us give up in an effort to drive into town and just return home, as the jams rise all the way up Clifton Common and beyond nor has the council put forward any convincing solution to the increase in demand for medical staff, schools, telecomes, water, waste. Land: is contaminated (radon) and no indication has been given as to how this would be dealt with HOusing: the distribution within Calderdale is totally disproportionate,

with Brighouse proposed to receive 48 % of the new housing when compared to the far bigger town of Halifax and other, emptier, less congested areas of Calderdale. This is NOT proportionate building - it will swamp and destroy a hamlet (Thornhills) and village (Clifton) community. Clifton, a small village, would have 16% of the housing, when compared to the vastly bigger Halifax with 20%. Greenbelt: this is one of the few that stops West Yorkshire being one whole conglomeration: stops Brighouse joining up with Bradford. With its removal, how would there be a 'strong, defensible' boundary between housing and greenbelt? there would not - there would no longer be a Clifton greenbelt. CIL levels are far, far lower at £40 per house than other areas of Calderdale, clearly to encourage building. This is not fair or justifiable - levels would have to be £60 to £65 per house to be equitable. Ecologically: the housing would completely destroy the diverse flora and wildlife of the area. It would take away from not only locals but visitors, one of the few remaining sites we have in the area in which to walk, cycle and view nature employment: the plan does not direct employment to deprived areas of the borough flooding - because of the steepness and landscape of the proposed area, a site which is already prone to flooding would be even more vulnerable

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

Duty to Co-operate Reason:

Suggested Modifications:

Suggested modification: use brown field sites and derelict areas of housing instead of destroying a much valued and appreciated area of green. I appeal to the inspector to come and spend some time in Clifton, Brighouse - to see what would be lost and what would be being inflicted, not only on existing residents but those who might be erroneously tempted to settle in the area: the reality would not be what they imagined. We are already at breaking point in terms of capacity.

Additional Evidence Link:

Comment ID **APX639**

Site ref (if applicable): **LP1463**

Person ID: **718418**

Name: **Mr Richard Burkinshaw**

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:

Whilst I am registered with you I am unable to navigate your website or the complex documents, so unfortunately have to make comments by e-mail. So my first comment is that given the above, the process of consultation is inadequate and flawed and is not sufficiently open, accessible or enabling to be a valid consultation. Secondly, regarding the Plan, having reviewed the documents, I observe that - Brighouse and Clifton are overburdened with the percentage and number of housing and industrial units, relative to the rest of Calderdale - there is insufficient evidence of attention to, and investment in, infrastructure including but not only roads, schools, public transport, - there is already a problem with air quality in the Brighouse basin and the additional burden of dwellings, industry and traffic is not addressed. Thirdly,

regarding the J25 business park, it is invalid to develop this location whilst there is extensive brownfield and empty business premises Fourthly, the Clifton garden suburb, is too dense, an smothers and extended area into amorphous suburbia, It does not address infrastructure or social needs The CIL community levy fund is underindexed and inadequate] Finally, the entire foundations of the plan, are unfortunately no longer valid, as since Brexit (after the plan assumptions were made) has totally changed the drivers of immigration, population, economic growth, and therefore invalidates the sums on which land and houses have been made. Whilst I don't condemn all development, we must invest, however the plan is not sound, the scale not justified, not geographically proportionate and must be scaled down, diluted, and evidence of mitigation of impacts made before it is fit for purpose. I ask you to take into account my comments, and offer my further assistance should your require positive suggestion as to solutions.

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 **APX653**

Site ref (if applicable): **LP1463**

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:

Woolrow and Woolrow Farmhouse, adjoining the northern edge of this area, are Grade II Listed Buildings. The development of this area could also affect the setting of the group of 4 Grade II Listed Buildings around Birkhouse Farm 300 metres to the north of this site. The Heritage Impact Assessment considered that since the proposed site includes the fields immediately to the south, southwest and east of the listed building, development on these fields will substantially affect the setting of the listed buildings and important views across the open countryside. 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. In addition, the Heritage Impact Assessment notes that part of the Listed Woolrow is currently in dilapidated condition. Even with mitigation outlined above, there will be

some minor harm to the significance of the listed building in terms of impact to its setting. However, the development of this site presents an opportunity to address a designated heritage asset in a poor state of repair, which could be at risk. As such, ways to secure the repair and incorporate restoration of the listed farm Woolrow is buildings should be considered as part of any Masterplan. 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 LP1463:- (a) Amend the seventh Site Specific Consideration to read:- "Implementation of the mitigation measures set out in the Heritage Impact Assessment" (b) Add the following additional Site Specific Consideration:- "Development proposals will be required to secure the repair of the Grade II Listed Woolrow"

Additional Evidence Link:

Comment ID **APX721**

Site ref (if applicable): **LP1463**

Person ID: **1128492**

Name: **Mrs Linda Melton**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Environment I am totally against the proposed housing development on the Green Belt land at Thornhills, Clifton. My chief concern is the amount of extra traffic that will result from the building of nearly 2,000 new homes on this site, which will add significantly to the poor air quality we have in Clifton and Brighouse. There is the potential for another 3,000+ vehicles to be travelling through Clifton, and there could be up to or more than 5,000 vehicles in total travelling through Brighouse from the Thornhills and Woodhouse sites alone. Add to this the vehicles that may come into Brighouse from Cooper Bridge and Bradley where new developments are also proposed. In fact, Calderdale is one of the 23 local authorities in England that have not met their air quality targets. The poor air quality in Clifton is mainly due to the M62 motorway and the constant standing traffic along Wakefield Road and Clifton Common. This congestion is of course magnified by any incident occurring on the M62. An added worry is the large toxic waste dump (2nd largest in the country) in Kirklees that lies right up against the Kirklees/Calderdale boundary, visible from Clifton and who knows what obnoxious emissions could potentially travel along the valley bottom into Clifton and Brighouse. Recent research has concluded that poor air quality can cause dementia and general mental health problems as well as the already known facts that it can cause respiratory and heart diseases. Figures show that Calderdale was ranked 122 out of 149 local authorities with one of the highest rates of premature deaths due to respiratory disease. There was a piece in the Brighouse Echo on 30th August this year regarding life expectancy in Calderdale. Paul Butcher, director of Public Health stated that

although people in Calderdale are living longer this is still below the national average. Shouldn't the problem of poor air quality be addressed before proposing such large developments in such a relatively small area of Calderdale? Does the health of Clifton and Brighouse residents mean nothing to the Council?

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 **APX722**

Site ref (if applicable): **LP1463**

Person ID: **1128492**

Name: **Mrs Linda Melton**

Organisation:

Agent ID:

Name:

Organisation:

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 Congestion Brighouse is well known as being a traffic bottleneck. All roads leading into and out of Brighouse are regularly full of standing traffic. At peak times it can be a nightmare. The additional vehicles from nearly 2,000 new homes at Clifton, plus the development at Woodhouse, plus the developments at Bradley and Cooper Bridge, could bring the traffic to a standstill. Clifton could become a rat run for vehicles travelling from the new development at Thornhills to junction 25 of the M62. From experience, a journey to Huddersfield at peak times, takes longer to get from Clifton to Sainsburys, than the rest of the journey into Huddersfield.

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

Duty to Co-operate Reason:

I do not think that Calderdale have consulted with their neighboring authorities regarding new developments. We will have nearly 2,000 new homes in Clifton and 1,257 at Woodhouse, plus the proposal of an Enterprise Zone at Clifton. At the same time Kirklees are looking to build 1800 houses at Bradley and an Enterprise Zone and new homes at Cooper Bridge. All this development is centered around junction 25 of the M62 at Clifton. There has been talk of opening another junction (24A) on the M62. Highways England have stated that they won't be building it. Kirklees don't think they will need it, and Calderdale are saying that they think Kirklees will do it. So, in all likelihood - no junction 24A to try to ease extra traffic.

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX723**

Site ref (if applicable): **LP1463**

Person ID: **1128492**

Name: **Mrs Linda Melton**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Ecology The Green Belt land for the proposed Thornhill Development is agricultural land that was mined from around the 14th century until the 1920's. The area is prone to flooding after heavy rain. After the rain of 2015 the areas of flooding were large enough for a few ducks to take up residence. The floodwater takes a long time to drain. There has also been flooding at the roundabout at the bottom of Clifton Common. If this Green Belt land is built on where will all the water go? It will go down the hill into Brighthouse and the flooding that has occurred intermittently over the years in the centre of Brighthouse, could possibly become a regular occurrence.

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 **APX724**

Site ref (if applicable): **LP1463**

Person ID: **1106506**

Name: **Mr Kelvin Lawton**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I do not believe that this Plan is legal on the following grounds. I am a small landowner and along with neighbours, own approximately 1.25 acres of land which is currently within the boundaries of the proposed Garden Suburb in Thornhills. At no stage in this process has Calderdale Council engaged with us during the preparation of this Local Plan. Only when I contacted them in early September 2018 did they realise this omission and, within a few days, presumably after checking the Land Registry, did they write to all of us, asking whether we wished to develop our land for housing or other development purposes. Of course this action by them was after the completion of the Final Draft Local Plan. Calderdale Council have failed to consult effectively with us and have also failed to take into account the views expressed in the Section 18 consultation. This lack of knowledge of who actually owns the land which they wish to develop

also indicates the poor quality and weakness of this whole exercise.

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

Sound Reason:

I do not believe that this Plan is sound. Disproportionate amount of development It is a disproportionate Plan with Brighouse, and Clifton in particular, bearing a disproportionate amount of housing, compared to other urban areas of Calderdale. Housing and associated development needs to be in other wards of Calderdale as well as in Clifton and Brighouse. I fully accept and agree that there could, and should, be some development in the Clifton area. However the proposal for 2,000 houses in a Garden Suburb is not unacceptable. There are more deprived and less economically affluent areas which both need and deserve housing and any associated economic development. A "Garden Suburb" has not been adequately defined in this Plan. Residents need to be aware of what kind of development this will be before they can constructively comment on such a significant development. Other than a sketch map submitted by the Local Authority two years ago, no detail. other than the boundaries of the proposed Suburb has been published. Infrastructure Should this Plan go ahead for the development of East Calderdale, then there needs to be a massive expansion and improvement in the local infra structure. Schools, roads, leisure areas, health facilities and local transport infrastructure needs to be developed before and during any such development. This Plan does not adequately address the infrastructure required and there is no detail in the Plan about how this will be achieved. There are speculative references to relief roads, motorway junctions and other links but no costed or details of how this will be achieved or funded. Green areas are part of every local infrastructure. This Plan proposes the removal of a large proportion of a green lung in the heart of Brighouse which is well used by both residents and non-residents for simple leisure purposes. The proposed development will lead to increased pressure on a local traffic system which is currently inadequate and not fit for purpose and is frequently gridlocked when the M 62 Motorway is blocked - a regular and increasing occurrence. Air Quality The quality of the air is already a major concern in the Brighouse area and it is reported that Calderdale and Kirklees are already under pressure from central government to improve this. Air pollution has a critical impact on health which is well documented elsewhere. How does Calderdale intend to improve this measure when it proposes to construct 6.000 houses and to construct an industrial development within the proximity of a Motorway which is also likely to adversely impact the quality of air. Along with large scale development in neighbouring Kirklees this is an issue which is of great concern and the Plan gives no reassurance of how this will be addressed. Community Infrastructure Levy It is reported that the Community Infrastructure levy (CIL) has been set by Calderdale Council at £40, compared to eg £85 for the Hebden Bridge area. This would appear to be a massive financial incentive for developers to invest in a development in eg Thornhills with a loss of resulting income to develop infrastructure in this area. Why is this? It has not been explained in the Plan or by local politicians in the debate running up to the publication of the Plan. Environment In the Plan there are detailed constraints about the development of a Garden Suburb in Thornhills. with references to the impact on the environment, yet there appears to be have been no notice taken of this by our local authority when publishing this Final Draft Plan. There were many detailed comments and objections in the Regulation 18 process about the potential loss of this unique historical, ecological and diverse locality but little notice has been taken of these comments. What was described as a sensitive are in terms of Green Belt is earmarked for the construction of 2000 houses. Alternatives Calderdale Council has chosen not to pursue reasonable alternatives to this mas development. Previously highlighted brownfield sites have been removed from the plan and developments could have taken place in other urban/ semi urban areas which could met the target housing numbers required. Again I would add that there could be and needs to be housing development in Thornhills and Brighouse but not in the numbers envisaged.

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

Duty to Co-operate Reason:

There is no evidence that in this Plan there has been any adequate or meaningful consultation with neighbouring local authorities, in particular Kirklees Council, where there are similar sized proposed developments in housing and industrial schemes within close proximity of the M62 Motorway. The combined impact of all of these developments with no agreed infrastructure plan is beyond comprehension and will lead to an industrial and housing conurbation which will engulf the local East Calderdale community with a loss of green belt and destruction to the local environment.

Suggested Modifications:

Abandon the proposed Garden Suburb plan and consult with the Clifton Village Neighbourhood Forum on planning realistic and appropriate housing development in the Clifton area.

Additional Evidence Link:

Comment ID **APX730**

Site ref (if applicable): **LP1463**

Person ID: **1182408**

Name: **Ms Eileen Smith**

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/5072104>

Comment ID **APX732**

Site ref (if applicable): **LP1463**

Person ID: **1133671**

Name: **Mr John D Wilcock**

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: <http://calderdale-consult.objective.co.uk/file/5072512><http://calderdale-consult.objective.co.uk/file/5111979>

Comment ID **APX745**

Site ref (if applicable): **LP1463**

Person ID: **1182812**

Name: **Mr Ryan Brisk**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Simple response to why this is completely ILLEGAL is because the land is greenbelt. It should never be built on.

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

Sound Reason:

Clifton and Brighouse already suffer with heavy congestion, and to create an entire new community in this area will make the town a nightmare. The roads cannot handle the volume of traffic as it is. There is also the moral issue of building on the greenbelt. This is wrong. I would also like to comment on how poor the communication has been from the council with regard to this plan. I have had to search hard to find out your incompetent plans - none of the information has been publicised. This feels like you are trying to "do a backhand" deal and get things through without people knowing exactly what is happening. All in all, this will spoil our local area and it will create irreparable damage. The area is used for recreation, dog walking etc. The area is also far too small for the scale of the proposed development. How can such a small area of Calderdale be assigned such a large quantity of houses? It is totally disproportionate. What does the council propose to do to combat air quality? The 4000 or so homes will undoubtedly bring more vehicles which means more pollution and more fumes. Great for everyone!! As mentioned above, the roads are already gridlock (even outside of rush hour). So bringing in all these extra houses, means that the council are going to lock up the roads even further, and actively increase the amount of accidents and congestion in our small town. I absolutely do not consider this plan to be sound. It is the opposite, and is an absolute disgrace.

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

Duty to Co-operate Reason:

Calderdale council is not compliant with the duty to co-operate. The council, in my view, has not considered the impacts that the proposed plans will have on the surrounding infrastructure - namely the M62 and the roads linking brighouse and clifton to and from the mororway at J25 (Wakefield Road,

Armytage Road, Clifton Common, Walton Lane etc.) I currently experience long delays travelling from Clifton to the M62 motorway. Has the council considered the impact that this plan, along with other neighboring local authorities (Kirklees Council at Bradley etc.) who are planning large housing developments nearby? All these plans sight the use of the M62 as why they are such good spots for creating housing - they portray the idea that the transport links make them ideal locations. Wrong. The relief road proposed for this scheme won't mitigate traffic, as all it will do is push traffic further along the line and create an even bigger bottleneck. My understanding is that Highways England have not agreed to anything in terms of road improvements.

Suggested Modifications:

The demographic in Clifton area is largely over 55's so has the council considered the more immediate need for retirement housing / homes? All the 'affordable' housing is to accommodate young people / young families who are trying to get on the housing ladder. Where will all their children go to school? Has the council considered that there are not enough schools in this area? Or does the council feel content for these people to clog up the roads and drive up the pollution levels, by having them commute to schools further afield??

Additional Evidence Link:

Comment ID **APX755**

Site ref (if applicable): **LP1463**

Person ID: **1115638**

Name: **Mr Tony Perryman**

Organisation: **Chair Clifton Village Neighbourhood Forum**

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

This plan is not legally compliant because there was not meaningful consultation at regulation 18. The Initial Draft Calderdale Local Plan had been prepared without a sound rationale or co-ordinated evidence base. As a result the proposals in that Plan cannot be seen to be credible. This has not in my opinion been considered in the Regulation 19 draft local plan. What is proposed in this Plan does not align with the evidence base that is available to date. It further does not align with its own strategic objectives. The Plan proposes a significant change in the proportion of green field versus brownfield land being used. The Plan proposes such significant incursions into the Green Belt on the most sensitive sites that it cannot align with its own strategic objectives to protect and enhance green infrastructure and the natural environment. The Plan proposes major developments where infrastructure is entirely lacking and unplanned/not committed, without any clear or up to date Infrastructure Delivery Plan. There is a failure in the plan to demonstrate that Calderdale has effectively worked and cooperated with other local Authorities. This is particularly the case when considering the issues that will be created by the developments in Kirklees. The spatial distribution was identified as flawed at regulation 18 and this has not been considered or discussed. This was the position in the initial plan at regulation 18 and still is the case now, the Council has failed to listen to the objective evidence put forward by the Clifton Neighbourhood Forum and has not addressed the issues evidenced. How can this resemble anything like meaningful consultation. The Council have decided that the views of the community in Brighouse and Rastrick in the main are to be ignored.

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

Sound Reason:

There are a number of issues that show that this draft local plan is neither sound or justified. This plan is transformational for the people of Brighouse and Rastrick, however is this particularly so, for the community of Clifton. This is indeed a community, which stands to lose its identity, nevertheless understands that it is necessary for development to take place. However, the community feels attacked on two fronts, from the Thornhills development and the Enterprise zone. The bulk of development in the local plan is centred in and around Brighouse, this is disproportionate. The question is why has this to be so? There has not been a full analysis of the housing requirements ward by ward in Calderdale. There are significant affordable housing needs throughout Calderdale. The area with one of the lowest experian vulnerability score in the Borough is Brighouse with a score of 7%, yet it's to have the most investment. Ordinarily this would be a welcome economic development. However, there are some real practical issues why the decision to concentrate all this development in Brighouse is flawed. E.g. Infrastructure, proposed CIL, Air Quality, Greenbelt and Disproportionate Allocation of Housing Infrastructure Clifton Neighbourhood Forum in its submission for Regulation 18 made the following point, which has not been addressed in the at Regulation 19; " There is a significant level of evidence still to be collected and collated to inform the Plan and to demonstrate it can be delivered without further saturating already inadequate infrastructure, including and most especially the highway network. Notwithstanding this, the major strategic decision to make 2 substantial housing allocations within the Green Belt around Brighouse (Thornhill and Woodhouse "" "Garden Suburbs") has already been made. This decision has been based on completely inadequate, particularly in respect of both the existing conditions on the highway network (the acute congestion problems in and around Brighouse have been massively underestimated) and the inevitable levels of impact on that already congested network (the levels of impact have been downplayed by applying flawed assumptions within the WSP Technical Notes which purportedly assess likely levels of impact)". The local plan also fails to take into account the developments proposed in the Kirklees local plan, in particular the 1800 houses that will be developed on the Bradley Golf Course. This will put enormous strain upon an already stretched highways network. Junction 25 on the M62 will be expected to manage this significant increase in traffic, emanating from the two garden suburbs, the Enterprise Zone, the Bradley development and other Kirklees proposals for industrial development. The Brighouse town centre sensibly does not have the capacity to handle this increase in Population. The Local Plan proposes major housing allocations and Green Belt release in Brighouse where is the substantive evidence that the necessary infrastructure can be delivered. Key infrastructure improvements are identified in the plan e.g. to M62 J24 and J25 and a new J24 over the plan period (within the Draft Infrastructure Delivery Plan (Appendix 2) and Draft Policy IM1), and are seen as essential for the delivery of the Brighouse sites, yet this infrastructure has no funding or delivery programme. The two garden suburb sites proposed for Brighouse will necessitate substantial infrastructure improvements. The Thornhill site will require a relief road in an attempt to reduce already high levels of congestion on the A641 (where is the evidence supporting this relief road, how or when will it be funded and delivered and can it successfully relieve existing acute congestion, let alone mitigate the impacts of 4,000 additional dwellings and 36ha of employment development within Brighouse). The plan suggests that this essential infrastructure requirement will be funded by the developer through the planning application process. I content that this is just not sound, because it is not viable to propose a significant greenbelt release without understanding fully how this will be funded and identifying at least the total budgeted cost. It follows logically if there is insufficient funding then the housing development is undeliverable, which given the concentration of housing in this area the whole local plan cannot be delivered. There will be a significant increase in population in Brighouse if the Local plan is adopted. The Local plan does not address the issues this raises; Healthcare Provision - How many Doctors, District Nurses, Dentists, Health Visitors, will be needed. Where is this additional provision going to be resourced from. How much input has been provided from the local CCG into the these potential issues and where is the detailed planning Education - The developments at Thornhill and Woodhouse, will create a greater need for school places. St John's Clifton for example is already oversubscribed. The phasing of School provision is going to create issues for places right across Brighouse. The Local Plan makes inadequate

provision and hasn't properly analysed the real needs of the community if this development goes ahead. Retail - Brighthouse Town Centre will not cope with this increase in population. There is no room for development given the current format of the town, to cope it is likely a plan for redevelopment would be needed. How does the local plan cater for this? Social care - There is net increase in the ages of the population of 56 and over in Calderdale. The Kings fund make the following comment; "When the NHS was founded in 1948, 48 per cent of the population died before the age of 65; that figure has now fallen to 14 per cent (Office for National Statistics 2011b). Life expectancy at 65 is now 21 years for women and 19 years for men (Office for National Statistics 2013c), and the number of people over 85 has doubled in the past three decades (Office for National Statistics 2013e). By 2030, one in five people in England will be over 65 (House of Lords 2013). This success story for society and for modern medicine has utterly transformed our health and care needs. Many people stay healthy, happy and independent well into old age, and there is mounting evidence that tomorrow's older people will be more active and independent than today's (Spijker and MacInnes 2013). However, as people age, they are progressively more likely to live with complex co-morbidities, disability and frailty. People over 65 account for 51 per cent of gross local authority spending on adult social care (Health and Social Care Information Centre 2013c) and two-thirds of the primary care prescribing budget, while 70 per cent of health and social care spend is on people with long-term conditions (Department of Health 2013c)". Older people should be able to enjoy long and healthy lives, feeling safe at home and connected to their community. The local plan does not engage at all with this concept. Currently in Calderdale 28% of the population are over 60 years of age and over the next ten years this will increase by 47%. Yet the Local Plan makes no provision to manage this obvious strain on the community. The following illustrates some of the issues the Local Authority needs to consider; Life-course strategies for public health and health inequalities have tended to focus on children and working-age adults rather than older people; in England, local health and wellbeing strategies have tended not to prioritise older people (Humphries and Galea 2013). There remain major inequalities in both absolute life expectancy and healthy life expectancy at 65, and in rates of premature mortality before 75 (Office for National Statistics 2011a) 11 per cent of people over 75 report feeling isolated, and 21 per cent feel lonely (Banks et al 2008). In England in 2012/13 there were 31,100 excess winter deaths " an increase of 29 per cent on the previous winter. Most excess deaths occurred in people aged 75 and over (Office for National Statistics 2013a). 34 per cent of people aged 65"74 are obese (Scarborough et al 2010), and only 8 per cent of women over 75 take the recommended levels of physical activity (NHS Information Centre 2009). Uptake of influenza and pneumococcal vaccinations is below the levels set by international targets and national guidance (Michel et al 2009; World Health Organization 2009; Public Health England 2013b). What we do know is: Life-course approaches to health and wellbeing that address the wider determinants of health . A person's health and wellbeing in later life are affected by determinants of health over the course of their life, such as education, poverty, housing and employment, as well as healthy lifestyles and health care. So interventions throughout the life course affect people in older age. And just as with health and wellbeing for younger age groups, all parts of the local system " from housing, the environment, social care, public health and health care " have a contribution to make. The most vulnerable areas of Calderdale do not receive the investment needed in the Local Plan, which will store up issues for the future.

Preventing social isolation and promoting age-friendly communities . Loneliness, social isolation and social exclusion are important risk factors for ill health and mortality in older people (Stephens et al 2012; World Health Organization 2002). Positive and supportive relationships with close family members contribute to older people's wellbeing, but those aged 75 and over are least likely to have these networks (Hoban et al 2013). Given the complex factors involved in isolation and loneliness, it is perhaps unsurprising that evidence about successful interventions is relatively limited, although group activities tend to have better outcomes than one-to-one interventions (Scottish Collaboration for Public Health Research and Policy 2010). The provision of social care in the community is a critical issue, this Local Plan does not make provision for community centres that will cater for these issues. Ensuring that we get housing right for older people The right supply of housing in terms of location, affordability, size, tenure and facilities is a crucial factor in enabling people to remain in their own homes as they age (All Party Parliamentary Group

on Housing and Care for Older People 2011). It is essential that new housing stock reflects the needs of the local ageing population, with sufficient extra care, sheltered and age-friendly housing available (Association of Directors of Adult Social Services/Housing Learning & Improvement Network 2012). Existing housing stock can also be adapted with aids and technology to assist older people with daily living and maximise their independence and safety. I cannot see in this Local Plan how this is catered for. This is not positively planned or consistent with government policy. Community Infrastructure Levy Calderdale have decided to adopt an approach of using differential rates. How did the Council decide to set these differential rates, and did they undertake fine-grained sampling to help them to estimate the boundaries for their differential rates? If this is the case could they demonstrate how they decided to arrive at the £40 per square meter in Thornhill? Community Infrastructure Levy (CIL) is designed to be non-negotiable: Therefore, no CIL, no planning permission. A developer assessing viability has to prioritise CIL above any variable or negotiable costs to the proposed scheme. So, how this figure is set will have a profound effect upon the viability of the scheme. Given all the issues however, concerning infrastructure for Thornhill and Brighouse in general, has the Levy been set deliberately low to encourage the developers at the expense of roads, flooding, schools and other facilities. A key point regarding how the CIL is it should be calculated is as follows; "By providing additional infrastructure to support development of an area, the levy is expected to have a positive economic effect on development across an area. In deciding the rate(s) of the levy for inclusion in its draft charging schedule, a key consideration is the balance between securing additional investment for infrastructure to support development and the potential economic effect of imposing the levy upon development across their area. The Community Infrastructure Levy regulations place this balance of considerations at the centre of the charge-setting process. In meeting the requirements of reg.14(1), charging authorities should show and explain how their proposed levy rate (or rates) will contribute towards the implementation of their relevant Plan and support the development of their area. As set out in the National Planning Policy Framework in England, the ability to develop viably the sites and the scale of development identified in the Local Plan should not be threatened ." The Council Vision document offers the following proposition: "These constraints need to be put into context: residential developers will tackle sites significantly in excess of 1 in 12 if the values are there. The constraints described above can be satisfactorily addressed and development is viable where land value or a more philanthropic approach to development warrants the additional cost. Typically therefore the delivery model would not be through volume house builders and development density would be reduced."□

Referring to constraints the Draft Local Plan is proposing major housing allocations and Green Belt release in Brighouse without even knowing if there would be sufficient infrastructure in place to deal with it all. Furthermore, as explained and evidenced within the TTHC Technical Note, the levels of existing congestion on the existing highway network infrastructure have been grossly understated. So, how does the Council fully explain how it is going to mitigate this issue, which is recognised as a significant traffic congestion problem , without sufficient investment in infrastructure. The CIL it argues for the Thornhill site will produce around £13million. This will be phased because of the nature of the development and can only therefore correct issues after they are required. In any event the CIL will not create enough money to invest effectively in the required road network to alleviate the issues in around Brighouse. There will be a need for schools, Junction 25 / 24 M62 etc, how are these to be funded? The Community Infrastructure Levy is set at a level that will not adequately deal with the infrastructure issues for these sites. It isn't necessarily the case that High CIL rates will make developments unviable, this will not be the outcome where schemes are large, high-value and that have a projected high revenue per square metre, which is the case for Thornhill and Woodhouse sites. Where CIL tariffs threaten to kill a project is at the lower-to-middle end of the spectrum. Air Quality Brighouse is in an Air Quality Management Area. Calderdale is one of twenty three local Authorities in England that has failed to meet its air quality targets. It is therefore difficult to conceive that 50% of the housing development and 40% of the industrial development will be in Brighouse and air quality will not deteriorate. The following is taken from Calderdale's own statistics; AQMA Name Date of Declaration Pollutants and Air Quality Objectives City / Town One Line Description Is air quality in the AQMA influenced by roads controlled by Highways England? Level of Exceedance

(maximum monitored/modelled concentration at a location of relevant exposure) At Declaration* Now Calderdale No.6 Brighouse Declared July 2007, amended March 2014 NO2 Annual Mean Brighouse Encircling Brighouse town centre YES 51 µg/m³ µg/m³ 49µg/m³ The recognised standard is 40µg/m³. What does this actually mean for the people of Brighouse? The two main causes of lung disease are smoking and air pollution. Between 2012 and 2014, Calderdale was ranked 122 out of 149 local authorities with one of the highest rates of premature death due to respiratory disease. This was 45 deaths per 100,000 people per year, i.e. 76 deaths per year for our population of 206,355. Separate to Calderdale's own monitoring in December 2015, DEFRA estimated (ie, modelled) that some roads in Calderdale were subjected to annual average levels of NO₂ of between 40 and 60ug/m³ (micrograms per cubic metre) as at 2015. These were: A629 at Salterhebble and Skircoat, Halifax; the area between the A629 / A643 Lindley Moor Road and the M62 at Ainley Top; A644 Wakefield Road from central Brighouse via J25 of the M62 to Cooper Bridge; A62 Cooper Bridge Road; A58 from Orange Street roundabout Halifax along, New Bank and Godley Lane; where the A640 enters Outlane near the M62 at Junction 23 (probably just outside Calderdale). National Planning Policy (The following are the regulations for promoting a healthy environment) Promoting healthy and safe communities a) anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate Ground Conditions and Pollution 181. Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan. The council's Strategy and Performance Scrutiny Board heard in September 2018 that although air quality is good for most of Calderdale its road network is operating close to capacity with pollution from road vehicles responsible for air quality objectives, set nationally, not being met in eight areas of the borough where Air Quality Management Areas have had to be set up, on the A629 at Halifax, the A58 at Sowerby Bridge, the A646 at both Hebden Bridge and Luddenden Foot, the A58 at Stump Cross near Halifax, Brighouse centre, the A58 at Hipperholme and, most recently added to the list, the A58 at New Bank in Halifax. Councillors commented on the report, which says air pollution is well recognised as a contributing factor in onset of heart disease, strokes and cancer with 120 premature deaths per year in the borough attributable to poor air quality. Councillors agreed the statistics around illness and estimated premature deaths were shocking and asked what they could do to help, and officers said their input and support for a new cross-directorate approach would be important. Yet these same Councillors passed the Local Plan that proposes to develop 50% of the houses and 40% of the industrial development in 3.9% of the total area of Calderdale which is already a air quality management area. WSP the Councillors advisors make the following point in a report commissioned by Calderdale (AIR QUALITY CONSTRAINTS ASSESSMENT); " Junction capacity constraints have also been identified and are located in key population areas of Calderdale. It is clear from this review that there is a correlation between the junction capacity constraints on the network and areas of poor air quality". The constraints are Junction 25 / 24 M62, the inability of these junctions to cope with the increased traffic generated by Calderdale's development in this area and also Kirklees. WSP go into comment " It is identified that AQMAs have often been declared in areas where there is a combination of high traffic volumes and buildings located close to the roadside which can hinder the dispersion of exhaust fumes. Local air quality monitoring data shows exceedances of the annual mean NO₂ concentration objective are only occurring within these AQMAs. Junction capacity constraints have also been identified and are located in key population areas of Calderdale. It is clear from this review that there is a correlation between the junction capacity constraints on the network and areas of poor air quality". The topography of Brighouse is such that it is in a basin it is difficult to see without a real reduction in traffic or a major

change in technology how emissions can be reduced. WSP admit that this is only occurring in the air quality management areas. To meet national planning requirements for air quality this plan is not sound or positively prepared. WSP also point out in another document, TECHNICAL NOTE 4: ASSESSMENT OF CUMULATIVE IMPACT "6.7.3 Junction 25 of the M62 shows links at the junction to be close to capacity. These are shown on the roundabout itself rather than the A644 or the M62". The WSP report then identifies that junction improvements are required in order to enable associated air quality improvements through reduced delays and reduced vehicle waiting. Junction improvement works and critical related infrastructure are therefore critical and essential in Brighouse in order to mitigate existing and future air quality constraints. This further shows that this Draft Local Plan does not align with the evidence provided by the consultants engaged to develop the evidence base. Greenbelt The National Planning Policy Framework states that; The government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. Green Belt serves five purposes : 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 to preserve the setting and special character of historic towns to assist in urban regeneration, by encouraging the recycling of derelict and other urban land So, the land currently identified by Calderdale in their Draft Local Plan with potential for housing, employment and mixed use 14% is previously developed land (brownfield), what this means is that 86% will be on greenfield sites, whilst 65% lies within the current Green Belt - so another 21% will be on greenfield sites outside Greenbelt . Brighouse represents only 3.9% of Calderdale's total area, but will take 50% of the housing and 40% of the industrial development, most of which will be on greenbelt. I fail to see how this complies with the National Planning Policy Framework as stated above. The Draft Local Plan is entirely contrary to its Green Belt Review. Paragraphs 6.5 to 6.8 of the Review clearly define the area around Brighouse as containing the "Most Sensitive Green Belt Parcels' . Paragraph 6.6 is clear in explaining why: "Generally, the parcels to the eastern side of the district contribute significantly to the purposes of Green Belt due to a combination of good inter-visibility and close proximity between large built up areas. These land parcels play an important role in helping to prevent the urban areas from merging. In addition, many of these parcels contain few significant boundaries and the land within them would be vulnerable to encroachment and sprawl.' At what point does this plan acknowledge its own evidence base. The draft plan is at odds with its own review and furthermore it fails to demonstrate exceptional circumstance why this greenbelt designation should be changed. Publication Draft Plan para 6.53 explains that, despite consistently high brownfield development rates historically, "this success has however reduced the potential supply of brownfield land that can be demonstrated to come forward as part of the Local Plan allocations, in terms of their availability, deliverability, achievability and viability." So, brownfield sites have been rejected, which potentially could have been included in the Draft Local Plan. NPPG 2018 now describes a typology-based approach to viability assessment, and at ID: 10-010-20180724 the guidance states: " In plan making and decision making viability helps to strike a balance between the aspirations of developers and landowners, in terms of returns against risk, and the aims of the planning system to secure maximum benefits in the public interest through the granting of planning permission." The approach followed by Calderdale in its Draft Local Plan is very different when considering brownfield sites. The Draft Local Plan does not balance public benefit with developer risk, it only considers purchase price as a measure of viability. NPPF2018 explicitly makes the point that the public benefit that accrues from re-using brownfield land efficiently, must be given substantial weight. The justification for using greenbelt is at odds with this point. The use of Brownfield sites has effectively been written off in the Draft Local Plan ,with complete disregard for public benefit and the viability of brownfield sites. This has major repercussions for the draft Plan's reliance on strategic sites in Brighouse for around one-third of the new land allocation. The inconsistencies here relate to the sustainability of the location, the approach to housing density, and consequently to the justification for Green Belt release. Disproportionate Housing Allocation In 2013 Calderdale carried out a Settlement Hierarchy exercise. In the exercise Halifax and Brighouse are set apart with the two highest sustainability scores, because they are the two biggest

settlements. Consequently, Brighouse it is suggested would only be capable of providing 20% of the housing and economic growth in the Borough. However, the Draft Local Plan completely ignores this conclusion, by proposing 50% of the housing and 40% of the industrial development in Calderdale. Brighouse is only 3.9% of the total area of Calderdale. Given the traffic congestion, the air quality issues, it is difficult to see how this Draft Local plan can be seen as justified for the people of Brighouse.

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

Duty to Co-operate Reason:

Only 45% of the people who live in Brighouse work in Calderdale. People commute to the surrounding areas, Kirklees, Leeds and Manchester. This leads to major traffic congestion, which is recognised in the Draft Local Plan. Given this fact, it is difficult from the Draft Local Plan to see that there has been cross boundary cooperation. Kirklees for example propose to build 1800 houses in Bradley, this will only exacerbate an all ready difficult situation. To what extent has there been cross border cooperation on traffic movement, given the proposed developments. The models used in both Authorities are not in sync. The result can only be further congestion and a reduction in air quality. If NPPF18 is considered, taking together the issues of traffic growth, the viability of the housing locations in Brighouse and housing density, the only conclusion that can be reached is Thornhills and Woodhouse fail these requirements for sustainable strategic-scale development. As such, they fall catastrophically short of the tests of exceptional circumstances for Green belt changes, as set out in NPPF2018 para 137: " Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy: a) makes as much use as possible of suitable brownfield sites and underutilised land; b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground." There is no evidence that has been any meaningful cooperation between the two Authorities.

Suggested Modifications:

The number of houses being proposed for Brighouse should be reduced by half A re-evaluation of Brownfield sites A CIL of around £60 should be levied to facilitate effective infrastructure development to meet the needs of the community A recognition that the road network is not currently adequate for the needs of the community The Enterprise Zone should be abandoned in favour of housing development. No more incursions into the greenbelt Air Quality Measures to be established that practical and feasible

Additional Evidence Link:

Comment ID **APX819**

Site ref (if applicable): **LP1463**

Person ID: **1182811**

Name: **Miss Jessica Boothroyd**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

It would appear that comments raised in the last consultation period have not been addressed. The community involvement in revision of the plans in 2017 have not been taken seriously. The number of houses been allocated to the Clifton and Brighouse area is disproportionate to the rest of Calderdale. The infrastructure has not been taken seriously. The small village of Clifton will not be able to cope with the amount of houses proposed to be built. Two more schools are a ridiculous idea especially since these are not being built until after the houses are built. Where will all the children go in the mean time?

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

Sound Reason:

The roads of Clifton are already grid-locked when the M62 is busy, so with an extra 2000 houses, this will cause major traffic jams and will not provide an easy motorway link as previously thought. An extra 4000 approx. cars on the road in a small village is ridiculous! The air quality will reduce due to the increase in traffic and vehicles using the roads to access the new houses. The land which you are proposing to build on is greenbelt land, and is home to wildlife who inhabit the area. Where will these animals go? I would question why there has been a removal of the cows/ bulls from the field in preparation of building new houses. Does this show an already done deal?

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

Duty to Co-operate Reason:

The council have not co-operated with the Highways England. The council suggested relief road doesn't do anything to combat the congestion when you actually reach Junction 25. There's still going to be a stack up of traffic somewhere... The council need to examine the demographics of the area in order to comply with the current residents of Clifton.

Suggested Modifications:

The allocations are disproportionate within Calderdale. Surveys have been carried out, however they have not been considered. There is a large cry for employment in North and West Calderdale, so why are employment zones being built in Brighouse?

Additional Evidence Link:

Comment ID **APX825**

Site ref (if applicable): **LP1463**

Person ID: **1183478**

Name: **Mr Allister Wormald**

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:

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

Duty to Co-operate Reason:

This development proposal is extremely out of proportion, and appears to be a just a finger in the air mass development plonked on the edge of a small village with little thought gone into the bigger picture. Being a resident, it doesn't take a lot to know that the area CAN NOT handle this development. The plans are overbearing and totally out of scale in all aspects. The quiet preserved village off Clifton could soon be drowned by the noise that comes with thousands of new houses and vehicles, completely tipping the balance of a village and town already on the brink, which will undoubtedly result in ruin. The proposed plans appear to swallow many popular dog walking and horse riding areas for locals and visitors, causing huge disturbance. Our pets and children will be at risk of extreme traffic increases to the area, as well as being pushed out of the normal walking routs, onto main roads, a nuisance does not do it justice. A few months ago, there was an electrical pole on fire on the Clifton common road, one police officer was directing traffic away from the site, the officer mentioned he was one of two police officers working Brighouse that day! there were two police officers policing Brighouse and Rastrick, it seems the local authorities are also feeling the pressure. The smallest disruption on the M62 causes total gridlock all over Brighouse and Clifton spanning over 5 miles in all directions. Regular commuting can take me over an hour to come off the M62 Brighouse junction up to Clifton village. Travelling on the train to Leeds at the same peak times in the morning means you are standing on the train all the way to Leeds. The transport infrastructure is already buckling and an increase in housing.... Pretty obvious! The destruction of the green belt land means all surrounding natural wildlife habitats will be destroyed, this is a major issue and cannot be overlooked. At least 150 houses will be overlooked by the new development, as a result, loss of privacy, natural light, increased noise, pollution and congestion which reduces our quality of life.

Suggested Modifications:

Additional Evidence Link:

Comment ID **APX836**

Site ref (if applicable): **LP1463**

Person ID: **1140074**

Name: **Ms Sharon Stubbs**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I feel there has been no meaningful consultation throughout the process and there are inconsistencies between the proposals in the first stage and the second stage. A significant part of the development is on greenbelt land and does not comply with Calderdales own strategy to protect this.

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

Sound Reason:

There has been no thought whatsoever into the supporting infrastructure. The road network is often at breaking point and can not accommodate the extra traffic the proposed development will bring. The extra pollution this will create will effect the air quality substantially. There has been little or no thought put in to the huge extra demand on local health care and education providers.

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

Duty to Co-operate Reason:

It would appear that there has been minimal, if any, cross border consultation between Calderdale and other local planning authorities. The proposed plan by Kirklees council to build 1800 houses at Bradley will put even more strain on a neighbouring town and little or no consideration has been given to this.

Suggested Modifications:

That the number of proposed house be reduced as this is disproportionate. The greenbelt/brownbelt land use should be re evaluated. The local infrastructure requirements should be thoroughly examined as they currently do not meet the needs of the community.

Additional Evidence Link:

Comment ID **APX838**

Site ref (if applicable): **LP1463**

Person ID: **1120241**

Name: **Mr Ben Sykes**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

N/A

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

Sound Reason:

Air Quality Brighouse is one of seven Air Quality Management Areas in Calderdale. I find it very hard to believe that the cumulative effects of the focusing of development in this area will not significantly worsen the current situation. The councils view seems to align with this concern, the air quality strategy document citing a key challenge to the problem as "Developing novel solutions with limited financial and staffing resources". The council cannot meet its current air quality requirements, never mind the ones that will result from this local plan. Road Infrastructure I live on Clifton Common (A643) with my wife and two children who both attend the local primary school. There are a number of families living on this residential road whose young children attend the local schools. My wife and I already have extreme concerns about the business of this residential road, and the speed at which cars and vans drive up and down the hill. We are keen supporters of introducing physical traffic calming measures before a speeding vehicle causes a serious accident on the road. The introduction of so many new houses into the area is likely to increase the usage of this route and will make an already serious situation much worse. The results from the speed sign recently erected by New Street provide evidence of this, showing cars regularly passing at speeds of greater than 50, and even 60mph during the day. The addition of 2x garden suburbs and a new Clifton enterprise zone, alongside the impacts of nearby developments by other councils will be insurmountable for Brighouse. They will have dramatic impacts on traffic flows around an area which is already extremely congested and very quickly becomes gridlocked following even small issues on the M62. The local plan does not provide any clarity on how it will be possible to manage this situation with development proposed at its current scale. Greenbelt The land between Highmoor Lane and Bradford Road, Brighouse (LP1463) is an extremely large parcel of green belt land that is proposed for housing development. Approximately a quarter of the site lies within the Wildlife Habitat network, and parts of the site are within an area identified as where priority habitats and or species are at a medium or a medium - high vulnerability to climate change. The allocation of this site on the scale that is being proposed also goes

against the fundamental aim of Green Belt policy which is "to prevent urban sprawl by keeping land permanently open and that the essential characteristics of Green Belts are their openness and their permanence" because this allocation and the adjacent employment site by Coal Pit Lane will result in the village of Clifton being merged into Brighouse. I have seen no exceptional circumstances cited in relation to the proposal and am extremely unclear on what basis it is being made. The argument must be extremely strong based on the number of green belt policies being overridden. I therefore believe the RAG status of this aspect should be Red / Negative. The order of the proposed development seems to be based purely on short term financial considerations, allowing building on the most accessible green field sites first as these are the most attractive to developers. This approach does not guarantee that all suitable brownfield sites in Calderdale will be built on. I feel that the plan should mandate the utilisation of ALL brown field sites ahead of any newly released green field sites. It does not make sense to change the status of the greenfield sites to allow building until all suitable brownfield sites have been exhausted. Disproportionate Allocation

The challenges for any given area supporting a single new Garden Suburb will not be insignificant. Supporting 2x garden suburbs and a new Clifton enterprise zone, alongside the impacts of nearby developments by other councils will be insurmountable for Brighouse. A single, smaller Garden Suburb would be a much more sensible approach, with others being distributed more evenly across Calderdale. Proposing Brighouse accepts 50% of the housing and 40% of the industrial development for Calderdale as a whole goes against the Settlement Hierarchy conclusions from 2013 which suggests the area would be able to support 20% growth for the Borough. It is inevitable that the overall, disproportionate nature of the proposal will generate support from all councilors and residents least affected by the proposition. This has unfortunately led to a situation where an unworkable plan is approved by the majority it impacts least, to the detriment of the residents of Brighouse. Flooding Locating both Garden suburbs, the Clifton Enterprise Zone (and the Bradley and Wyke sites) in such close proximity to the Calder will dramatically increase the risk of downstream flooding between Brighouse and Dewsbury. As described in the "Calder catchment Strategic flood risk assessment volume 1": "downstream of Dewsbury the floodplains of the Calder broaden and include large areas of washland" which indicate impacts only reduce beyond Dewsbury. Locating such a high concentration of development in the lower Calder valley will therefore increase the likelihood of flooding in Brighouse, Mirfield and Ravensthorpe. Brighouse is also at the highest risk of groundwater flooding across the entire borough of Calderdale (see pg21 & 22 of Calder catchment Strategic flood risk assessment - volume 2). The only proposed mitigation against flooding is the use of SuDS. One of the key reasons cited for locating the garden suburbs in the lower valley are as a result of the flood risks in the upper valley. If the flood risks are equally severe in Brighouse, the use of SuDS should be an equally valid mitigation for placement of the garden suburbs in the upper valley. Community Infrastructure Levy It is also very unclear what has led to a community infrastructure levy of £40 for the Brighouse area, a differential rate much lower than for other areas (i.e. Hebden bridge = £85). Has the level been set to attract developers to this area instead of with the aim of raising sufficient funds to implement the required infrastructure to support it? Have we got sound proof that a CIL at this level will cover all required infrastructure and that the shortfall will not have to be met by the tax payer? I cannot see any. Lack of focus on an ageing population The local plan proposal seems to have overlooked the fact that, with an aging population, there will be an ever increasing demand for housing suitable for the elderly, the location for which need not be driven by employment zones. Why not build a "Retirement Suburb" away from areas that are already over congested? It would not require the same levels of road infrastructure to support, and would dramatically increase the rate of downsizing in existing areas, freeing family size homes near areas of employment.

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

Duty to Co-operate Reason:

The challenges for any given area supporting a single new Garden Suburb will not be insignificant. Supporting 2x garden suburbs and a new Clifton enterprise zone, alongside the impacts of nearby

developments by other councils will be insurmountable for Brighouse. I do not believe the cumulative effects of the combined proposals across Calderdale, Kirklees and Bradford have been assessed or addressed as part of the planning process.

Suggested Modifications:

Scale back Thornhill Garden Suburb Create new garden suburbs / retirement suburbs elsewhere in Calderdale and distribute evenly and fairly Refocus on the upper valley and mitigate flood risks using SuDS Workable and coherent proposals to manage infrastructure changes required to deal with increased demands Workable and coherent air quality proposals Remove Clifton Enterprise Zone and repurpose allocation for housing Scale back Woodhouse Garden Suburb Re-examine impacts of proposed adjacent developments by Calderdale and Bradford councils

Additional Evidence Link:

Comment ID **APX870**

Site ref (if applicable): **LP1463**

Person ID: **1139223**

Name: **Mr Richard Stubbs**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I feel that the plan is not legally compliant as there was no consistent consultation, at either stage of the planning process. There was no understandable evidence base in the initial draft and the proposals in the second draft are inconsistent and is not consistent with Calderdale's objectives, to protect the Green Belt. The plan proposes a major increase in the use of green belt land as opposed to brownfield land. There appears to be no committed plans for improvements to the infrastructure. The plans do not show any committed consultation, by Calderdale with neighbouring Local Authorities. I feel that the views of the local residents have been dismissed.

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

Sound Reason:

It appears that Calderdale's plans to build housing is to be mainly in the Brighouse area, whilst not in other area covered by the council. The developments in Brighouse are disproportionate. The village of Clifton, where I live will completely disappear, being surrounded by the housing at Thornhills and the Enterprise zone in the Wakefield Rd area. The plan seems to take no account of the increased traffic flow into, out of and through Brighouse and the detriment this will cause to journey times and air quality.

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

Duty to Co-operate Reason:

Brighouse is situated at a crossroads, between Halifax to Junction 25 of the M62 and Huddersfield to Bradford. It already suffers a bottle neck at busy periods. it appears that the plans do not identify any co-operation between Calderdale and the neighbouring Authorities, with regard to the increased flow of traffic. What consultation has there been with NHS with regard to provision for the increased population and with Education Departments with regard to the need for more school Places.

Suggested Modifications:

The amount of CIL should be increased to cover the cost of improvements to the infrastructure, whilst the number of houses to be built should be reduced. The Enterprises zone should be delayed until other sites have been investigated, away from an already congested area. Consideration should be given to compliance with the required levels for air quality.

Additional Evidence Link:

Comment ID **APX903**

Site ref (if applicable): **LP1463**

Person ID: **1182072**

Name: **Mr Chris Tindal**

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?: **No**

Sound Reason:

Greenbelt and Open Space Almost all of the 140.66 hectares of LP1463 is currently greenbelt. Under the National Planning Policy Framework, greenbelt designation is there to check urban sprawl, safeguard the countryside, provide opportunities for access to the countryside for people living nearby, and retain attractive landscapes near to where people live, and secure nature conservation interest and agricultural use. A large proportion of Calderdale is currently open countryside, particularly in the western and northern areas. In the Brighouse area this countryside is much less prevalent. We have greenbelt near Lightcliffe, the Shibden Valley and Clifton. In this densely populated corner of Calderdale, our greenbelt is of particular importance due to the fact we don't have the protected open moorlands of the South Pennines and the corresponding wooded Clough valleys that Halifax has nearby. This patch of greenbelt is one of the most important ones in Brighouse because it can be seen over such a wide area and forms a green backdrop to a large proportion of the people of Brighouse, being in a prominent position. It also provides a clear demarcation of Clifton and helps the village retain its identity, something which Calderdale Council admit is important for human wellbeing and prosperity. This site meets at least 3 of the 5 criteria for 'Greenbelt Functionality' so is therefore 'high functioning greenbelt.' In the Site Assessment Report, of which the previous comments of people seemed to have been largely ignored, it is stated that this area of greenbelt performs strongly but little else is mentioned of the fact that the whole site currently has this status. It does conclude that there would be no loss of open space. This seems to be because the area does not have 'open space' designation, therefore no loss of 'designated' open space. If 140 hectares of countryside are built over in such a significant position, then how can there not be a loss of open space to the people of Brighouse? Just because it doesn't have that designation, it is still open space available to thousands of local people. The report also states that there are plenty of alternative natural areas in the catchment area to meet the adopted standards. Where are they within walking distance? The whole point of greenbelt is that it is near large numbers of people and is accessible by walking. Are there 'very exceptional circumstances' to remove the greenbelt status of such a large and prominent patch of countryside? This removal will be completely disproportionate compared to the rest of Calderdale when in fact this busy corner of Calderdale needs to cling on to its greenfields more than anywhere else in the region. Ecology The border of LP1463 looks to have been drawn remotely from someone not familiar with the topography of even having visited the area. It encompasses a variety of habitat types, some of which

have UK BAP Priority Habitat status. The western border runs right up to and follows Clifton Beck. According to the UK BAP, a floodplain is essential to ecological functioning and also significant area of adjoining priority habitat may form an integral component of a river system. The whole west facing edge of LP1463 is lowland broad leaf woodland which is a UK BAP Priority Habitat. The border even cuts through the top of Welholme Park woods. It also includes 'Rock Hole' woods along Jayhouse Lane and the Sanatorium woods. From the Sanatorium woods northwards along the western slope is all semi/unimproved acid/neutral grassland, another UK BAP Priority habitat. This continues all around Thornhills hamlet and along a broad strip on the eastern side of the hamlet, only turning to improved grassland on the open flat plateau of Green Farm. Species rich native hedge, another UK BAP Priority habitat is found in several areas within the 'boundary'. The whole northern side is a small semi wooded and very picturesque valley with a stream down the middle, and steep slopes on both sides, but particularly so on the south facing side. To the bottom is a large pond, another UK BAP Priority habitat. This small, tranquil place is a real gem right on the edge of Brighouse and provides immeasurable benefits to thousands of local people and wildlife. Within the boundary there is a wide variety of wildlife species in such close vicinity and walking distance to large numbers of people who do not need to drive anywhere to see them. Within Schedule 1 of the Wildlife & Countryside Act and enjoying full legal protection there are Fieldfare (winter), Kingfisher, Barn owl and Redwing (winter). Of Red List species, there are Fieldfare, Redwing, Lapwing, Skylark, Grey Partridge, Yellowhammer, Curlew, Tree Sparrow, House sparrow, Starling and Song-thrush. On the Amber list there are Bulfinch, Dipper, Kingfisher, Reed Bunting, Kestrel, Tawny Owl, Meadow Pipit and Stock Doves. Birds that are Calderdale Conservation Concern are Mistle Thrush, Curlew, and lapwing, Barn Owl, Skylark, Tree Sparrow, Song Thrush, Swallow and Swift. A broad strip of open countryside from Thornhills hamlet up to Highmoor Lane south of Jayhouse Lane is used by the colony of Tree Sparrows. They primarily nest around Ox Close and travel backwards and forwards to Thornhills Hamlet for feeding. Some nesting has also occurred sporadically in Thornhills hamlet. This has been completely ignored. Of the Schedule 5 animal species, there are at least two species of bats present, but probably more. UK BAP species include the Brown Hare, Hedgehog, Common Toad and Brown Trout. A Badger set occurs outside of the boundary to the north and another outside the boundary to the south. The site itself has a recording of badger presence and offers a foraging ground and potential corridor between the adjacent sets. The habitats and wildlife around Clifton are currently under recorded, although records are being compiled and centralised so the above list of species is likely to grow. Many more species occur that, although have little protection, are an integral part of the biodiversity of the area. Despite claims that a 'garden village' can somehow increase 'net biodiversity gains', the building over of this important patch of greenbelt of 2000 houses can only have a detrimental effect on biodiversity and the wellbeing of thousands of people within walking distance. The 'Response to Comments' in the report state that 'only limited development may be possible north of Thornhills Beck Lane and development may not be possible in the triangle of fields immediately south of Jay House Lane'. The conclusion states 'some development likely to be acceptable but likely to need to be considerably scaled down'. It appears the council's own conclusion has been totally ignored as the boundary remains the same as does the number of houses proposed. Housing Garden Villages are a good idea if there is space to support them and they are in an area with large areas of countryside, like the outskirts of Cambridge and York. Brighouse doesn't have large areas of countryside and this development will swamp Clifton and Thornhills and rob Clifton of its greenbelt. According to Calderdale Council, population growth is at a significantly slower rate than was previously projected and is slower than that of England as a whole. The largest growth is in the over 65's of 14,200. There is actually a projected reduction in the population of people between 25 and 65 by 5,200, and by 9500 of over 75's. This means just 4% total gain by 2033, all by the over 65's. Will the new housing reflect this? Of the 92511 houses in Calderdale, 3292 are vacant and 1642 have been so greater than six months. How are the vacant properties in the region being tackled before we build over more countryside? The overall target for the number of houses in Calderdale has been reduced, so why does this patch of precious greenbelt still have nearly 2000 proposed? Have all the existing brownfield sites been thoroughly explored? No one is against providing new homes for people but the scale of development is completely

out of proportion to the rest of Calderdale. Brighouse is only around 4% of the area of Calderdale but it appears the new housing allocation is nearly 50%. Traffic Calderdale Council states that it will be a place that has responded to climate change, reduce greenhouse gasses, become more energy conscious and efficient in its use of resources. The 2000 homes will mean the increase of at least 2000 cars moving in and out of the site. According to the 'Vision for the Local Plan' the development will be 'A place where environmental sustainability will contribute to well-being'. What will be the impact of many thousands of new vehicles on our already strained network? The comments from the council of the original draft focus on a new junction 24a, and a new lane between J24 and 25. Has funding for this been allocated? According to the Highways England, development of this site should not be commenced until later in the Plan period. Traffic assessments will need to demonstrate that the proposals will not have a severe traffic impact. Highways England state that the widening of junction 25 and signaling is unlikely to accommodate the new trips created by the development and a more significant intervention is required. Brighouse is regularly congested already so without the 'mitigation' a severe traffic impact is certain. The proposed 'bypass' is vague and the start and end points lack clarity. On the current proposed boundary there is no inclusion of a by-pass at all. Brighouse is one of the most congested parts of Calderdale already. According to Highways England, the model should demonstrate the cumulative impact of all development within the Plan. This, according to them is: Include all sites, incorporate two-way trips morning and evening. Include all the developments of neighbouring Local Plans highlight any congestion nodes which are a result of cross boundary development. Many thousands of new vehicles will be pouring in and out of this already regularly gridlocked, congested and densely populated corner of Calderdale. Have these considerations been made? Air Quality Recent research shows that poor air quality is having a detrimental effect on human health such as lung and cardiovascular disease. Calderdale Council has not met its Air Quality targets and persistently exceeds the European Limit Values for Nitrogen Dioxide concentrations. Brighouse town center is an Air Quality Management Area that exceeds the European and UK domestic NO2 concentrations. According to Calderdale Council, they are legally obliged to meet air quality targets and there should be no more than 40 micrograms per cubic meter of NO2 as an annual average, but this is currently 49 micrograms. According to Calderdale Council these high levels are associated with high traffic levels. There are plans to try and tackle this, but building 2000 homes on Clifton's greenbelt, an enterprise zone in the common and 1200 houses at Woodhouse's greenbelt will result in many thousands more cars and lorries coming in and out of Brighouse. Any attempts to reduce emissions will surely be offset by this huge number of vehicles in such a small and already congested corner of Calderdale. Summary Greenbelt €“ the area is high functioning greenbelt and offers immeasurable benefit to people and wildlife. It is in a prominent position and can be seen throughout Brighouse. Ecology €“ the area contains a number of protected bird and animal species as well as several UK Biodiversity Action Plan species and habitats. Housing €“ Brighouse, and Clifton in particular will receive a disproportionate amount of housing compared to the rest of Calderdale Traffic €“ The existing infrastructure is already inadequate and this, along with the development of Clifton Common, Woodhouse and nearby Kirklees developments will only add to the already congested roads. Air Quality €“ Brighouse is already above the national average for NO2 concentrations and this, along with the development of Clifton Common, Woodhouse and nearby Kirklees developments can only have a detrimental effect on public health.

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/5075611><http://calderdale-consult.objective.co.uk/file/5074026>

Comment ID **APX916**

Site ref (if applicable): **LP1463**

Person ID: **1130224** Name: **Mrs Rachel Wilkie** 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:

Effective measures to address the air quality issues in Brighouse that will be exacerbated by the Local Plan A reevaluation of possible sites in the remainder of Calderdale including Brownfield sites A CIL of around £85 should be levied to support effective infrastructure development Substantive, impartial professional work, to evaluate the current state of the transport infrastructure in Brighouse and then a full assessment of what is required to accommodate the Local Plan The number of houses being proposed for Brighouse should be reduced materially No development on Greenbelt / Greenfield land

Additional Evidence Link:

Comment ID **APX942**

Site ref (if applicable): **LP1463**

Person ID: **1182813** Name: **Mrs Gillian Poole** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

The LPA does not comply with the appropriate regulations as not all affected persons have been notified during the consultation period and commenting on the plan has not always been possible due to the technology to submit representations being compromised.

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

Sound Reason:

The proposals in the LPA are not sound for a number of reasons Positively prepared This proposal has not been objectively assessed in relation to a number of factors Meeting current housing needs in Calderdale - there are currently a number of vacant housed within the LA that could be developed and brought into the housing stock without building on green belt. The assesement does not appear to have been rigourous

and does not focus on the critical issues in relation deliverability and viability with reference to the lack of planned infrastructure to support this part of the plan. The current traffic situation is unacceptable, with Clifton common being frequently impassable at certain times of the day. Resulting in a 45 minutes journey to get to the otherside of town (normally a 5 minute journey). If there is a problem on the M62 then the whole of Brighiuse becomes seriously grid locked. Housing on the scale of the proposals will add to this problem. Air quality in the area is well below the government guidleines and extra traffic will only contribute to this. The lack of planned infrastructure prior to this significant increase in the volume of house as proposed in the plan will considerably affect the social dynamics, the environment and health and well being of the current residents in the area. Contrary to the LA principles to maintain green spaces to enable the The transport links to the village are currently inadequate with 1 bus per hour and no bus in the evening and on a Sunday, providing no viable option for residents to use greener ways to travel and reduce carbon emissions There are no umnet requirements across neighbouring authorities as consulation and dialogue has not been had with them Justified The disproportionate number of houses proposed within this area in comparison to the proportion of land that this area is in relation to the whole of Calderdale. Other sites across the LA should be considered to share the impact of building this number of houses more proportionately Effective No consultation with neighbouring authorities does not support the dialogue required to enable cross LA priorities

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

Duty to Co-operate Reason:

Suggested Modifications:

Consult with all affected residents in the area. Review the plan to consider the disproportionate nature of the current proposals in this area of the LA

Additional Evidence Link:

Comment ID **APX951**

Site ref (if applicable): **LP1463**

Person ID: **1182810**

Name: **Mrs Kathryn Greaves**

Organisation:

Agent ID:

Name:

Organisation:

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 building of more homes is justified if they are needed but the proposed development on this land does not meet infrastructure requirements for the following reasons - I feel that the number of homes needed in Calderdale is overestimated. There are many houses for sale in the area, according to the Brighouse Echo (06/09/2018) there are more sellers than buyers in the housing market. - Garden suburbs are the wrong sort of development. By 2030, one in five people will be over 65, accommodation for elderly people and extra care housing would be more appropriate, then family houses would be released onto the market. Also, a large proportion of households are single occupant and the lack of buyers in the market would suggest that social and affordable housing would be more appropriate. - The number of houses

allocated to this land is disproportionate to the development in the rest of Calderdale and will drastically alter the character of historic villages. - The present infrastructure is woefully inadequate. The extra vehicles generated by more housing would totally grid lock the roads. The M62 already resembles a car park at rush hour times. Local schools are also at capacity and although new health centres can be built, they would be impossible to staff due to the National shortage of GPs and Nurses - It goes against National policy to promote healthy and safe communities. Calderdale already has a poor air quality record and the extra traffic would make the situation worse leading to more respiratory disease, heart disease and cancer. The National clean air summit in June recognised that polluted air is damaging lungs, shortening lives and impacting severely on the overstretched NHS. - Decimation of green belt land should be an absolute last resort. The loss of grassland and meadows is threatening many species of wild flowers. - A recent report in the Lancet highlighted the relationship between quantity of green space and mental health in children. There is also a National problem with obesity, we are the fattest nation in Europe. Taking away green space in which to walk, cycle and play will exacerbate this problem. - there are problems with flooding in Brighouse. Covering green space with hard surfaces will cause more run off and exacerbate the problem.

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

Duty to Co-operate Reason:

I see little evidence of collaboration adjoining authorities.

Suggested Modifications:

The plan would be more sound if - A proper investigation of the sort of homes that are needed in the future was undertaken taking into account the aging population and who actually needs housing. - Investigation of all brown field sites is published. Green belt should not be used until all brown field sites are exhausted. - The problems of inadequate infrastructure are considered and solved. Plans for the provision of safe cycling and walking are published. - The development was spread fairly over Calderdale and the Community Infrastructure Levy was fairly applied. - An investigation into the species of fauna and flora that would be lost to our environment if these files were removed. - The health of our population was actually considered

Additional Evidence Link:

Comment ID **APX956**

Site ref (if applicable): **LP1463**

Person ID: **1139234**

Name: **Ms Amie Walton**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

As a small landowner in the proposed plan for the Thornhill's Garden Suburb I have only just been written to, a few weeks prior to the end of the second consultation period, inquiring about the availability of my land. Surely this should have been done prior to any published plans were done, instead of showing a complete disregard for residents in the designated area?

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

Sound Reason:

Our area has already failed to meet its air quality targets. How will the council achieve this if they are going to build another 2000 houses in this small area alone, increasing the pollution on Clifton Common. The traffic on this road is already greatly affected by the M62 and is regularly congested from motorway accidents and delays. As a commuter to Huddersfield it takes the same amount of time to drive the short distance down Clifton Common and through Brighouse than it does from Brighouse to Huddersfield. Junction 25 is already well over capacity not just at peak times but throughout the day. Motorists queue to get off the junction on the slip road and there is a constant queue of traffic to travel the short distance from the roundabout at junction 25 to Cooper Bridge. A councilors comments in the press suggested that the housing development had been voted for as it was close to junction 25, avoiding blocking up other areas, such as Bailiff Bridge. This would be a valid point if all the residents were to commute on the M62. Of my immediate neighbors only 20% actually commute on the M62, the rest work locally. What surveys have been done by the council to justify this? The ambulance station in Brighouse uses Clifton Common as a regular route to attend many emergencies. The additional vehicles in this area and Brighouse will have a detrimental impact on their journey time. If the council is to support a cycle to work scheme, how will they ensure cyclists are safe? For the cyclists using Clifton Common as their route, the road is already too narrow to allow passing traffic, with residents cars parked on both sides of the road, not to mention cyclists as well. The proposed 2000 houses will have a significant impact on our ecology. Farming will have no place, the habitat for our current wildlife will disappear, as will our birds, butterflies, bats, foxes, hares, rabbits, deer, frogs and hedgehogs. Once our green belt has gone it will not return and the circle of life will ultimately become the circle of death. Brighouse is already a flood risk, with the Boxing day floods of 2015 being the most recent. Building these additional houses, concreting the green fields and digging up trees will further add to the flooding, due to the water run off. It will impact our health, removing areas which are used on a daily basis for exercise, by walkers, runners, cyclists and horse riders. We will have to travel to visit places to exercise, increasing further pollution. As a small landowner, my land which is included in the proposed "garden village" is currently being used for growing produce. This could be replaced with concrete, removing the ability to be self-sufficient and reducing CO2 emissions. There are a number of empty unused buildings in Brighouse, which should be used to provide housing before any green belt sites are touched. The Millroyd Island development was a successfully renovated building, which is a prime example of utilising dead space. There are also a number of brown belt sites, which have also been overlooked. The percentage of housing due to be built in such a small area as Clifton (village) is almost the same as Halifax (town), how can this be a fair allocation? Surely the split should be a ratio in relation to size of area. What calculations have been used on the plan? There appears to be no long term thought that has gone into the development and it is merely a quick fix plan to build as many houses in one small area as possible to comply with the governments requirements before their submission deadline.

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

Duty to Co-operate Reason:

Calderdale, Kirklees and Bradford MD Council have either already built or intending to build significant housing developments within close vicinity of junction 25 of the M62. As this junction cannot already cope with the flow of traffic running through it, what is the plan for the management of this? Have all the councils had a meeting to discuss this?

Suggested Modifications:

Renovate all the old empty spaces lying vacant.

Additional Evidence Link:

Comment ID **APX958**

Site ref (if applicable): **LP1463**

Person ID: **1130161**

Name: **Dr Katharine Carlton**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Failure to consult adequately during the 2017 draft plan consultation (which took place during the summer holidays) The use of sensitive green belt to build a large housing estate runs counter to the National Planning Policy Framework.

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

Sound Reason:

The Local Plan is unsound for several reasons- In removing this site from Greenbelt, the Council acts against its own Greenbelt review in which the site is designated as 'most sensitive'. This area performs well as a buffer zone between Halifax and Dewsbury / Bradford The Settlement Hierarchy identifies Brighouse as a 'Principal Town'; as a Tier 2 town it ranks below Halifax - a 'Sub-Regional Town' (whilst Clifton does not feature in the Settlement Hierarchy at all, seemingly unworthy of being classified as a Tier 4 or 5 settlement), meaning that it despite being considerably smaller than Halifax, it is having to absorb 50% of the proposed housing and 40% of the proposed industrial sites. The Community Infrastructure Levy (CIL) has been set at £40 for the Thornhills site. This is less than half the amount for Hebden Bridge. The Council has not explained how it arrived at this figure, nor justified why this is a reasonable levy given the large scale, complex infrastructure requirements the site requires (not just roads but medical facilities, schools etc) Due to high levels of pollution, Brighouse is situated in an Air Quality Management Area. The Council has not explained how the addition of thousands more car journeys will improve air quality in Brighouse. Linked to this point, section 12 relates to encouraging health and wellbeing, in which walking and cycling are encouraged. The Calderdale Way runs through this site, thus it is already used for walking, cycling, running and horse riding and as such fulfills this aspect of the Local Plan already. It will not be used for such healthy activity if it has been built upon.

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

Duty to Co-operate Reason:

The Council has not co-operated with the local community adequately. Concerns raised by comments in the 2017 Draft Local Plan have not been responded to. Calderdale MBC did not organise any information sessions in Clifton. Cross border co-operation with Kirklees does not appear to have taken place. The large development at Bradley (both industrial & residential) will also impact upon this neighbourhood, however, this does not appear to have been taken into consideration by Calderdale MBC. Calderdale MBC still identify Junction 24A of the M62 as a potential intervention in section 13.18. However, they do not provide any money to bring it forward and Kirklees MBC has stated that it will not be paying for it, neither will Highways England. There appears to have been a failure of communication and cooperation with neighbouring Boroughs as well as local residents.

Suggested Modifications:

Revisit some of the brownfield sites removed at an earlier stage of the process, particularly those in the Halifax area

Additional Evidence Link:

Comment ID **APX972**

Site ref (if applicable): **LP1463**

Person ID: **1130164**

Name: **Miss Frances Dugdale**

Organisation:

Agent ID:

Name:

Organisation:

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 wish to register my belief that the Local Plan is not based on sufficient sound evidence to justify the disproportionate amount of housing and development planned for this area under the guise of a term 'garden suburb'. The area is greenbelt and has been identified by Calderdale's Greenbelt review as of high sensitivity. Whilst the area enjoys access to the motorway, the local roads are already gridlocked at rush hour and at any point at which there is a blockage on the motorway when motorway traffic uses Brighouse as a cut through to both Huddersfield and Halifax. The area proposed for this development is enjoyed widely by both residents of Clifton and the wider Brighouse area for walking, cycling and horseriding. I wish to challenge this proposal on the overall grounds of sustainability: The development will destroy existing sensitive greenbelt with no clear plans to protect existing green corridors and wildlife the lack of acknowledgement of existing uses for recreation of this area does not fit with Calderdale's ambitions to promote walking and outdoor recreation to increase health benefits for local people. the scale of development proposed is disproportionate in terms of overall housing allocations for Calderdale resulting in widespread damage and degradation to this area and also inequitable share across the Borough in terms of provision of additional housing the plan fails to take account of the cumulative effect of proposed housing developments within the Kirklees Local Plan. the resulting traffic will lead to even greater pressure on the few crossing points across the Calder river with associated increases in risk from air pollution.

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

Duty to Co-operate Reason:

Suggested Modifications:

reconsider the scale of the proposed developments within this site and work up new proposals which are more in keeping with demonstrating a genuinely sustainable solution which takes better account of local people's views and better account of the value of the existing greenbelt.

Additional Evidence Link:

Comment ID **APX973**

Site ref (if applicable): **LP1463**

Person ID: **1183175**

Name: **Mr James Calverley**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I have assumed that the process has been legally compliant

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

Sound Reason:

A proposal to introduce 2,000 houses into the Green Belt does not comply with the plans strategic objective to protect and enhance the green environment. There are no plans to put in place a credible infrastructure to accommodate these significant additions to the housing population and no plans to mitigate the combined impact of both Kirklees and Calderdale plans on the Brighouse area , which is already struggling to cope with the current situation. Any plans subsequently put forward must be in place before building commences. There is no evidence that there has been a consultation process between Calderdale, Kirklees and Bradford in preparation of the respective local plans and therefore no consideration given to the combined impact to the region. Wakefield road (A644) is currently designated an air quality management zone with high levels of NO2. Adding a further 4,000+ houses to the area together with additional volumes from the neighbouring plans, will only make the situation deteriorate. No consideration has been given to Healthcare, Education, Retail, Social care, Flood defences The CIL for Zone 8 has been set at £40 psm which is considerably lower than similar greenfield sites in (Zone 1) and (Zone 4) set at £85 psm. Why has this been set so low when such a high level of infrastructure is required.

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

Duty to Co-operate Reason:

There is no evidence that there has been a consultation process between Calderdale, Kirklees and Bradford in preparation of the respective local plans and therefore no consideration given to the combined impact to the region. Despite considerable comment and input from the Clifton and Thornhills residents and the Clifton Forum during the consultation stage, Calderdale have failed to acknowledge local opinion.

Suggested Modifications:

The number of houses being proposed for Brighouse should be reduced and proportionate within the Calderdale region Review all Brownfield sites A CIL of £85 should be levied to fund an effective infrastructure A strategy for the necessary infrasture to be in place before building commences Additional Air Quality Measures to be in place before any increase in traffic

Additional Evidence Link:

Comment ID **Lpp1073**

Site ref (if applicable): **LP1463**

Person ID: **1182310**

Name: **Mrs Chris Dawson**

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/5081661>

Comment ID **Lpp1097**

Site ref (if applicable): **LP1463**

Person ID: **1164715** Name: **Miss Rebecca Greaves** 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/5082126>

Comment ID **Lpp1120**

Site ref (if applicable): **LP1463**

Person ID: **1125817** Name: **Mr D Boothroyd** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

See attachment

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

Sound Reason:

See attachment

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

Duty to Co-operate Reason:

Suggested Modifications:

Housing allocations should be more proportionally allocated throughout the whole of Calderdale instead of over 50% in one small area of Brighouse. Brownfield land not Green Belt land should be used for new housing. Meaningful consultation should take place with other councils to ensure traffic congestion, other infrastructure is addressed and subsequently put in place before housing development of this scale is considered in Brighouse.

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5084282>

Comment ID **Lpp1121**

Site ref (if applicable): **LP1463**

Person ID: **1122327**

Name: **Mr Graham Ward**

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 write regarding to local plan which proposes development of land at Clifton, Brighouse, being land between Highmoor lane, Walton Lane and Bradford Rd in Brighouse. I am totally opposed to this plan as it stands. Calderdale have produced this with a proposal to build up to 2000 house on green belt land. I believed that such land was sacred, and had to be maintained as open land, unless there was no other possible alternative. The Authority clearly does not agree with this idea. Surely there are more suitable sites in Calderdale. My wife and I have lived in Clifton for over 45 years, and have seen the village develop since 1972, to such an extent that there does not seem to be an available building plot left in the village. We have embraced the development that has taken place over the years, but this is a step too far. Calderdale have put forward this plan without any consideration for the residents of Clifton and Brighouse. Where is the infrastructure to support this development. There are no plans for new roads to facilitate this development, which will ultimately lead to total chaos on the roads in and around Brighouse. Brighouse is grid locked each morning and evening, as drivers attempt to pass through the town. I would invite you to visit when the M62 motorway is closed, a frequent event, nothing can move as drivers seek a diversion route. On Highmoor Lane Walton Lane, which is the boundary road, traffic can queue from the centre of Brighouse to the top of Walton Lane, and back in to the village of Scholes in the Kirklees area. Towngate in Clifton, is home to a nursery school and St Johns Academy junior school. This road is already busy with traffic seeking to by pass Brighouse to reach the M62. This route takes traffic down Westgate and Coal Pit

Lane, very narrow roads, and in part there is only room for one way traffic. This plan will only cause more traffic problems. This also applies to New St, a residential street, which will also bear the brunt of extra traffic. I understand that air pollution in this area is also above what is considered to be the safe limit, and much has been written about the derogatory effects of increased pollution. This should be an important point to be considered, especially as Calderdale wish to develop a so called Enterprise Zone, adjacent to Clifton Common. If this plan is approved, it will effect all the residents of Brighouse. Where are all these new residents going to shop. The towns car parks are already busy, especially those provided by the supermarkets. There are no plans for additional car parks, no land being available. As I understand it, there are no plans for other essential services. The doctors surgeries are full, and the nation is already short of doctors to staff existing surgeries. The local schools are full to capacity, and we are told that there is a national shortage of teachers for new schools. I cannot see how this development can be justified. Brighouse will be taking on board a dispropotionate amount of house building in relation to the rest of Calderdale, to the detriment of all residents of the town. I urge you to dismiss this application.

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 **Lpp1126**

Site ref (if applicable): **LP1463**

Person ID: **1184900**

Name: **Mrs Patricia Keene**

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?: **No**

Sound Reason:

Regarding LP1463 Land in Clifton and Woodhouse, I have been looking at the planning map outlining proposed land to be used for housing and industry. To me it does not look either sound or viable to use these areas. WHY has Brighouse been chosen to lose so much environmental space. I am quite alarmed at what will result from this being passed as SOUND AND VIABLE. Brighouse is gridlocked every day and is getting worse with increasing pollution, why pick on these areas, looking at the map there are much better areas in Halifax.

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 **Lpp1141**

Site ref (if applicable): **LP1463**

Person ID: **1128665** Name: **CLlr Scott Benton** 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:

I do not consider the Local Development Plan to be sound nor legally complaint as it currently stands. Furthermore, I do feel that it adequately discharges the 'Duty to Cooperate' with neighbouring Local Authorities. The current draft has caused considerable concern among residents across Calderdale for numerous reasons. Many local people do not feel that the draft plan properly addresses the challenges in terms of development both in their own area, and across Calderdale as a whole. However, it is the residents of Brighouse (whom I represent) and Rastrick who are most strongly opposed to the current plan. As their representative, I completely share the concerns which are expressed by the vast majority of the people in these communities. The residents of Brighouse & Rastrick overwhelmingly feel that the Local Plan is not fit for purpose and is unsound "" this as because they feel that the plan does not include sufficient detail with regards to how the infrastructure needed to accommodate an addition 4,900 houses (over the course of the plan period) will be delivered and are concerned that their area is receiving a greatly disproportionate level of development. Both of these concerns are valid. My view that the Plan is neither deliverable nor effective, comes from an analysis of the evidence base upon which it is built. It relies extensively on the assumption of locating two garden suburbs in South-East Calderdale. In fact, without these garden suburbs, the plan falls down as it cannot meet the basic housing requirement. The evidence base to demonstrate that these sites are deliverable is woefully deficient and thus by implication, the entire plan cannot be demonstrated to be sound. I will elaborate upon the weaknesses in the evidence base which supposedly demonstrates the viability of the garden suburbs, and particularly, the Thornhills site (LP1463), before outlining some of my general concerns about this plan. Green Belt Review and the Duty to Cooperate The current draft states there are special circumstances as to why Green Belt land should now be used for housing. However, the designated Green Belt in South East Calderdale is not a single local authority area designation "" it is a West Yorkshire wide designation which crosses Council boundaries. This poses the question as to why a West Yorkshire wide Green Belt review has not been carried out instead of each authority conducting its own review? The current Plan does not seek to answer this question, yet it is made explicitly clear in the Green Belt Review final report that cross boundary consideration of this key strategic matter is an absolute requirement under the Duty to Cooperate. This is therefore a fundamental failing of the Plan. This issue is compounded by large developments in Kirklees at Bradley Park and Cooper Bridge, encompassing over 3000 new houses and a business park "" both of which are adjacent to the Calderdale garden suburbs. The obvious interaction between the developments on both sides of the boundary makes the duty to cooperate critically important and our failure to adequately discharge this duty of serious concern. Specific concerns about the Thornhills Garden Suburb (LP1463) There are fundamental shortcomings in the evidence pertaining to the Thornhills site: - Despite the site report acknowledging that there will be flood risk issues, no detailed assessment has been carried out to consider whether this site is feasible or what impact development may have upon downstream areas. - There has been significant past mining activity underground which is likely to reduce the extent of the site which is developable. Again, none of this has been considered by the site assessment reports or the

strategic vision document. - Concerns relating to the ecological impact, landscaping issues, heritage, or how to deal with contaminated parts of the land have not been fully addressed. - And finally, there is no analysis regarding the ownership of the site and how the fragmented plots could be brought together to deliver the site. It would be unfeasible to request that the sheer amount of work required to investigate all of these different issues could occur with regard to each and every one of the sites in the plan. However, the Thornhills and Woodhouse Garden Suburb sites are by far the largest single allocations, accounting for over a third of all of the new housing. Without them the plan fails. The lack of detailed site assessments and evidence to verify the deliverability of these sites is thus a staggering omission from the plan and one of its major weaknesses.

Highways Evidence The single greatest weakness of the garden suburb proposal is the highways evidence. The Council commissioned WSP to produce several reports on the Local Plan. One of these reports "" Strategic Vision For South East Calderdale "" Traffic Statement, was produced in 2016. This report stated that its main purpose: 'is to set out the traffic modelling work that has been carried out to support the strategic vision for South East Calderdale'. The traffic report effectively states that the existing highway network is operating satisfactorily and that with no further highway improvements it will continue to operate without any onerous impacts when the traffic from up to 6000 houses is added. This was the document produced and circulated at a Local Plan Working Party meeting of the Council when the concept of the garden suburb was first confirmed as a fundamental part of the plan and so the importance placed upon this traffic document in illustrating that the two garden suburbs are deliverable is absolutely paramount. The Clifton Village Neighbourhood Forum has commissioned a highways consultancy firm to complete an independent examination of the transport implications of the Local Plan. This report focused upon the allocations in Brighouse and in particular, the Thornhills site. This independent report concluded that the Council's traffic modelling work, conducted by WSP, generally understated the level of the existing demand on the highway network in Brighouse. It further noted that 'many locations in Brighouse are significantly over capacity and are operating under severely congested conditions'. It concluded that in the Council's report the scale and severity of the highways impact has been significantly understated and that 'the decision to propose such significant development in Brighouse has been based on completely inadequate highway evidence'. This independent report merely confirms what people in Brighouse already know: that the road network is at breaking point and the town centre and main routes are severely congested on a daily basis. . The notion that Brighouse could withstand thousands of additional homes and that this would not be 'particularly onerous' on the highway network is absolutely laughable. Yet this is what the Council's traffic report claims. The fact that this independent report reaches a completely different conclusion to the Council's traffic report is of grave concern. This report undermines the conclusion that the highways network in Brighouse can facilitate development on such an enormous scale and casts doubt on the deliverability of the garden suburbs. Because the Plan is so over reliant of these sites, the conclusions of this highway report cast doubt on the integrity of the Plan as a whole. I would request that the Inspectorate considers this independent report as part of this examination. These are not the only examples of flaws in the handling and interpretation of the evidence base. Due to the weaknesses in the evidence, Strategic Objectives, SO 1, SO7 and SO8, which relate to sustainable development, transport, and narrowing the gap, cannot be demonstrated to be achieved within the plan.

Infrastructure The current Infrastructure Delivery Plan (IPD) is extremely weak and badly lacking in detail. It does not demonstrate that substantial development is deliverable because it does not clearly illustrate how, where, and when the highway improvements, schools, health facilities, and other services needed to support development will be delivered and funded. The IPD gives absolutely no assurances that the key schemes needed to unlock growth will actually go ahead - as the Council's own supporting documents openly acknowledge. It is a complete and utter failure and members of the public will rightly question how the Local Plan can rest upon such a deeply flawed document. The IPD does state the need for transport improvements and additional schools and health facilities in the wider Brighouse area. However it does not contain sufficient detail to make a compelling case that the plans are achievable or are likely to be delivered. For example, the IPD recognises the need for additional doctor surgeries in the area but the Council haven't discussed the additional provision that will be required with GPs in the area who know

nothing of the Council's plans. Furthermore, despite making several attempts to gain this additional information, GPs in the Brighouse area remain extremely disappointed that further information on how additional capacity will be delivered has not been forthcoming from the Council. Similarly, the plan suggests three additional schools in the Brighouse area but does not outline where precisely these will be delivered; does not evidence that there is sufficient land for these within the Garden Suburbs alongside the housing allocations; and does not outline where the funding for these will come from. Finally, the Council justifies the Garden Suburbs on the basis of transport improvements in the area but has no idea what form the 'strategic highway improvements' will take and openly admits that these are not fully costed or funded. To include a mere sentence or two of detail about these schemes in the IPD "" when the whole of the Local Development Plan rests upon these transport improvements demonstrating that the Garden Suburbs are deliverable "" is at best, extremely worrying and at worse, incompetent and embarrassing.

Unfair nature of the Plan The current plan is deeply unfair and biased with the vast majority of development taking place in 'Eastern Calderdale': in Brighouse, Rastrick, Northowram, Shelf and Elland. Over 4600 of the 9000 new houses (which the plan lists sites for) will be in the Brighouse, Rastrick & Hipperholme area - despite this area making up only a fraction of Calderdale's current population. The plan places a disproportionate amount of housing growth on a small number of areas which is deeply unfair and undeliverable. Although the Plan allocates development on a small percentage of the total amount of Green Belt land, in areas such as Brighouse and Northowram, the proportion of greenfield and Green Belt land lost to development is very high. Furthermore, environmental and ecological concerns such as flooding on some sites, and significant air quality issues in places such as Brighouse, Hipperholme and Sowerby Bridge have not been adequately addressed. In particular, the lack of a detailed plan for addressing air quality and health issues for the AQMA in Brighouse, which is located next to the garden suburbs, is a glaring omission. In fact it is the lack of detail in relation to how the Council will mitigate the impact of air quality issues in the Brighouse area which is one of the plan's main weaknesses. We all know about the devastating impact that poor air quality can have upon people's health. There is an existing AQMA located in between both proposed garden suburbs and yet where is a comprehensive plan from the Council to demonstrate that the developments outlined within the plan will not negatively impact upon both existing residents, and those who will live in the new developments? The lack of detailed plans to mitigate the impact upon people's health as a consequence of these developments is in blatant breach of national planning policy (Promoting healthy and safe communities and Ground Conditions and Pollution)

Other concerns include the consultation process last year (2016) and the extent to which the 8000 individual comments have been evaluated in a meaningful way; the site assessment process; and indeed, the difficulties residents have had in taking part in the current consultation due to ICT problems on the Council's website. I would strongly suggest that the number of responses to this current consultation (especially from residents in the Brighouse & Rastrick area) would be significantly higher were it not for the disappointment that residents feel in terms of the Council ignoring their concerns thus far in the Local Plan process. A final weakness of this plan, is that it Doesn't take account of the needs of the different communities of Calderdale. The Council lists 'reducing economic inequalities' as one of its key aims. This plan presents an opportunity to create employment opportunities in areas of deprivation, inject infrastructure spending where it is required, and to build affordable housing in places of high demand. So what have the Council done to further these objectives? They are proposing to build 3000 houses, and the greatest concentration of new job opportunities, in Clifton and Woodhouse "" two communities which are statistically among the wealthiest 10% of the entire country. Meanwhile, the communities which are most in need of housing and employment opportunities get overlooked yet again. Parts of north and west Halifax which are crying out for the regeneration which new housing, jobs, and infrastructure development could bring, receive less employment growth and affordable housing than the spatial hierarchy would dictate. What about places such as Todmorden, Hebden Bridge, Mythomroyd and Ripponden where house prices are rising rapidly and social housing waiting lists are increasing. These communities are also overlooked. An appalling failure to provide the affordable housing that working people in these communities desperately need. Another wasted opportunity to regenerate Todmorden Town Centre and

to provide the sites for housing and industry which are needed to sustain the economy of the Upper Calder Valley. This is a Plan produced without an evidence base which is fit for purpose. It is built upon two garden suburbs which cannot be demonstrated to be deliverable and without which the Plan fails. It does not meet its own strategic objectives and cannot be described as credible, sound or fit for purpose. It is not supported by the people of Calderdale and the opposition to the plan in the communities of Brighouse and Rastrick is almost unanimous. I would urge the Inspectorate to consider the points outlined in this response; the concerns that come forward from the people of Calderdale; and the detailed evidence proposed by groups such as the Clifton Village Neighbourhood Planning Forum with their forensic analysis of the 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 **Lpp1143**

Site ref (if applicable): **LP1463**

Person ID: **1128397**

Name: **Mr Jacob Boothroyd**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

See attachment

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

Sound Reason:

See attachment

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

Duty to Co-operate Reason:

See attachment

Suggested Modifications:

The Plan should be re-examined and the disproportionate allocation of housing in the Brighouse area should be reduced. Community Infrastructure Levy - this should be investigated. Why has the rate been set so low for the Thornhills, Clifton area "" has this been a deliberate attempt to provide an incentive for the developer to build in this area?

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5084720>

Comment ID **Lpp1144**

Site ref (if applicable): **LP1463**

Person ID: **1125815** Name: **Mrs K Boothroyd** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

See attachment

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

Sound Reason:

See attachment

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

Duty to Co-operate Reason:

See attachment

Suggested Modifications:

I propose that the site LP1463 remains as Green Belt in its current form for the emotional health and wellbeing this brings to many and to assist in safeguarding the countryside from encroachment. The Plan should be reassessed and housing allocations redistributed more fairly across Calderdale. Brownfield sites to be developed rather than greenbelt land. Investigate why additional housing has not been allocated to areas in Elland and Halifax i.e. Illingworth, Ovenden which are in desperate need of this. All information available to the Council has not been included within the Plan, therefore the evidence is not up to date. The procedural aspects of the local plan should be examined to ensure the council has correctly followed the process.

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5084733>

Comment ID **Lpp1145**

Site ref (if applicable): **LP1463**

Person ID: **1184963** Name: **Kim Boothroyd** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

See attachment

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

Sound Reason:

See attachment

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

Duty to Co-operate Reason:

See attachment

Suggested Modifications:

I propose that the site LP1463 remains as Green Belt in its current form for the emotional health and wellbeing this brings to many and to assist in safeguarding the countryside from encroachment. The Plan should be reassessed and housing allocations redistributed more fairly across Calderdale. Brownfield sites to be developed rather than greenbelt land. Investigate why additional housing has not been allocated to areas in Elland and Halifax i.e. Illingworth, Ovenden which are in desperate need of this. All information available to the Council has not been included within the Plan, therefore the evidence is not up to date. The procedural aspects of the local plan should be examined to ensure the council has correctly followed the process.

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5084733>

Comment ID **Lpp1147**

Site ref (if applicable): **LP1463**

Person ID: **1185027**

Name: **Mr Andrew Denford**

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:

Brighouse Garden Suburbs "" in particular LP1463 (Clifton) I wish to comment on the Local Plan Draft Allocation, as I feel that is not a sound and justified Plan, for the following reasons: Disproportionate Allocation of Sites I object to disproportionate allocation of new housing sites in Brighouse. The total number of proposed new houses in Calderdale is 9,500, and total number for Brighouse and Rastrick is 4,500, which is just less than half of Calderdale's whole allocation. The Council has chosen the easy (some might say lazy) option of including a huge number of sites to the east of Calderdale, in particular, Brighouse & Rastrick, because they are apparently 'easier to develop'. Brighouse is not the largest town in Calderdale, but it is being selected for the largest number of new housing, with the largest site in the whole of Calderdale being 2,000 in Clifton, and the second largest being 1,200 at Woodhouse, both of which are on high-scoring Green Belt. This means that one third of Calderdale's new housing allocations is to be on 2 sites in the Brighouse area. Neither of these sites have the necessary infrastructure in place. This infrastructure has not been planned for implementation prior to building taking place, which renders the sites undeliverable and the Plan therefore unsound. Several other possible sites for urban extensions in Calderdale were considered and filtered, and other more suitable sites have been overlooked by the Council, together with other smaller and more readily deliverable sites. The Council should revisit some of these other sites, together with derelict and brownfield sites, before looking to build on Green Belt "" giving a more proportionate allocation of new housing in the area. Open Space The proposed developments in Clifton will effectively wipe out a huge area of natural open space around Brighouse and will change the landscape forever. The people of Brighouse (and from further afield) use this area for recreational purposes: cycling, horse riding, walking, dog walking etc., and there are several public

footpaths crossing the open fields. There is an abundance of wildlife in the area, such as foxes, deer, hares, bats and several species of birds "" their habitat will be completely destroyed, should development be allowed to take place. Air Pollution The proposed development of so many additional houses will mean up to 10,000 potential additional vehicles in the area, which in turn will lead to further problems with air pollution, due to standing traffic. Calderdale is one of 23 Local Authorities in England that have not met their Air Quality targets. Yet they are proposing to build over 4,500 homes and an Enterprise Zone in an air quality management zone, how do they propose to mitigate against the increase in vehicle emissions? Infrastructure The Local Plan proposes major developments "" garden suburbs "" in Brighouse, where infrastructure is entirely lacking and unplanned/not committed, and without any clear or up to date infrastructure delivery plan. In the Site Report for LP1463 the Council acknowledges that this is the case and that this will restrict any development until much later in the Plan period. As mentioned, one third of the allocations for Calderdale is to be on 2 sites, which are currently high-performing green belt and which do not have the required infrastructure in place, nor has this infrastructure been adequately planned to be implemented prior to any building taking place. In other words, these sites are currently not deliverable. Not only are the current roads in Brighouse unable to cope with any additional traffic, but also the local schools, doctors etc are oversubscribed "" all these factors require addressing.

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

Duty to Co-operate Reason:

Failure to adequately Publicise the Local Plan I feel that Calderdale Council has failed to adequately inform all residents of Calderdale about the Local Plan throughout the process. There are still plenty of people who haven't heard of the Local Plan; and given the importance and far-reaching effects of this document, I find it incredible that more hasn't been done to address this. Failure to Consult with neighbouring Councils Calderdale appears to have failed to take into account the proposals included in the Kirklees Local Plan (which is much further ahead in the process than the Calderdale one) "" see the following points, to name but a few: There are 1,577 houses in Kirklees Local Plan planned for development at Bradley (Site Ref 1747), which is just across the other side of the Motorway from the Woodhouse site. So, the Bradley site plus the Woodhouse site will equate to 3,000 properties proposed, plus another 2,000 properties at Thornhills, Clifton. That is 5,000 houses on only 3 sites within a few miles of one another. This will mean up to an additional 10,000 cars from these 3 sites alone, which will all feed into the same transport network, including the M62 which is frequently at a standstill at peak times, and whenever there is an accident. Additionally, Calderdale is suggesting an Enterprise Zone at Clifton, when there are multiple proposed business sites in Kirklees, just across the boundary at Bradley and Mirfield and beyond, which would certainly be more attractive to companies looking to invest, given the topography of the Clifton site.

Suggested Modifications:

Additional Evidence Link:

Comment ID **Lpp1188**

Site ref (if applicable): **LP1463**

Person ID: **1185062**

Name: **David Jones**

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 write to voice my concern over the planned development at Clifton Brighthouse and whilst I understand some additional housing is required I feel the planned number is very, very excessive. The area is already a bottleneck on Clifton Common. Vehicles are parked on both sides of the road making it very narrow for cars to pass, commercial vehicles are very disruptive. The foot of Clifton Common at the roundabout is already a bottleneck as is Wakefield Rd into Brighthouse, especially at peak morning traffic times. Air quality is a concern especially in standing traffic as I have both been in the vehicle and a pedestrian to experience this. Walking up Clifton Common in peak traffic is very difficult on the respiratory system, difficult to walk and distasteful. I am deeply concerned over the current infrastructure and its inability to support the plan. Doctors' appointments are currently running at 3 weeks, this will only get worse.

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 **Lpp1189**

Site ref (if applicable): **LP1463**

Person ID: **717523**

Name: **Mr Bradley Walton**

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 am writing to object to your proposals to build 16,000 new homes, predominantly on greenbelt land, in Calderdale. With particular objection to the plans for 2,000 homes in Clifton. My belief is that until all brownfield sites and unused land in urban centres has been used up we should not further destroy our precious green spaces, a finite resource for wildlife, leisure, farming and, indeed, life itself. Someone must stand up to protect these areas that have been until now regarded as out of bounds for development. What has changed? Are we now to disregard the wisdom of our forebears? For what reason and at what cost? The reason seems to be because to build on greenbelt land is the 'easy' option, the profitable option for the owners of landbanks, the land promoters, the privileged few and, indeed, the council. The best decisions in life are rarely the easiest route or the most profitable, but the ones we take because they are the right thing to do, the moral choice, the one that serves the best and greatest interest. By building on greenbelt you are not serving the people of Calderdale but robbing them of access to the nourishing green spaces that we all need, now and for generations to come. Once this beautiful and vital resource is wiped out it will never come back. These decisions will ring through the generations and have long-lasting,

irreversible consequences. I urge you to ask why we need to build here? Where is the pressure coming from for these particular sites? (It is a question I would like to have answered myself) Is it for the common good or to serve those who wish to put profit before anything else? Clearly growth cannot continue forever. Like the greenbelt land in Calderdale, the resources of Yorkshire, Britain, Europe, and the world, can only support so many people, especially if we continue to destroy our natural habitats and the biodiversity that underpins our survival. I am not against sustainable growth, that is growth at a slow rate, which is focused on maintaining our symbiotic relationship with the wildlife around us, but this relies on advances in technology and our understanding of the interconnected relationships between humans and our planet. This requires endeavour, expertise, understanding and a respect for the natural world; it won't be the easier route but it will at least give us the chance of a healthier and more harmonious society, perhaps with fewer extreme weather events, that has a real future. Unsustainable growth has no future and harms everyone. If the goal is monetary growth, the growth we should be targeting is in better jobs in the tech and green energy sectors, benefiting the people that are here already and their offspring (and in turn the whole world). This smarter growth increases the council's coffers without having to resort to the blunt instrument of artificially raising population numbers to ensure the money keeps on pouring in. Following the Brexit vote, migration to Britain has slowed and is expected to fall further. The projections that were in place for population growth are now outdated and should be adjusted to take account for this. Is there still sufficient need for all these extra homes? With specific reference to the plans for 2,000 homes in Clifton, the land earmarked for development is largely high ground that slopes in the direction of Brighouse and building here will without doubt significantly increase surface water runoff into the rivers and becks of the town. Brighouse has already recently suffered flooding and this will only get worse if the land is developed. It is also worth pointing out that due to the complexities of surface water drainage mapping, any projections for the impact of such runoff are likely to fall short of the actual impact " as several studies have shown. Further restrictions to building on this site are the impact to wildlife, such as insects, birds (including species such as the curlew), bats, butterflies, foxes, hares, rabbits, deer, hedgehogs (which are particularly at risk at the moment) and frogs, and the destruction of ancient hedgerows that are essential habitats for our native species. The proposals seem to be in direct conflict with the council's own Biodiversity Action Plan, which sought to protect our green corridors that allow wildlife the links to roam from area to area. Once these links are closed the complex and largely not-yet-fully-understood relationships between species will be broken. We only have to look at the vital role that bees and other insects have in pollinating our fruit, vegetables and other plants to get a taste of how each small part of the whole plays an essential and valuable role in keeping our planet, and us, healthy. In order to fight global warming, carbon emissions and pollution on a global scale, we must first look to our local areas and protect them. If we don't stand up to protect the areas we love and respect, who will. But it is also a sign of how we wish to preserve the whole - of how we ask others to join us and do the same. The beautiful and vital green land around Clifton is also a resource for farming and leisure. I use the quiet roads of Jay House Land and Thornhills Lane to run in the countryside, as do many others. I see many other runners, cyclists, families walking with children, dog walkers and horse riders all enjoying time in the countryside, on their doorstep. These roads are essentially green lanes through a farming and wildlife oasis that people enjoy. Why take this away? Residents will be forced into their cars to drive to other areas of natural beauty - further clogging up our roads and creating yet more pollution. Numerous footpaths also criss-cross across the land, including the Calderdale Way. Why not encourage tourists to use these rather than Tarmac over them? What attraction will the Calderdale Way have it winds its way through housing estates? The green spaces of Calderdale are what set it apart from the urban sprawl of its neighbours, Kirklees and Bradford. Don't allow our towns and villages to merge into one, losing their character and the precious green space between them. Why not embrace Calderdale's uniqueness and beauty and pledge to be the first council in the country to pledge to turn away from mass-development style housing? If we are to build more homes surely these homes should be built sustainably and in a way that enhances the natural world around them. We should be building sustainable homes in small clusters, keeping more of the green space around them and minimising the impact on the environment and on other residents. Contrary to what it states in your

plan, much of the proposed site in Clifton is overlooked - by homes along Clifton Common, Kiln Fold, Highmoor Lane, Jay House Lane, The Clough, Thornhills Lane, Victoria Avenue, Cam Lane. It's not enough to say that beauty doesn't count or matter since that is so much of what we hold dear in life. The beauty of a loved one. Art. Sport. The sunrise on a spring morning. Life itself. To deny this matters or has value is madness. Of the landowners, how many have given consent? I know some have not given consent, including me. Indeed, I have only just been consulted on the availability of my land within the proposed Thornhill Garden suburb. Why has this only been done at this late stage? Where is the legal process? How much of the land has been acquired by land promoters, or for how much do they have options to sell for development, and therefore a financial interest in getting planning approval? The garden suburb proposal would increase congestion on our already often-gridlocked roads. Clifton Common is often at standstill now. It can also only further reduce our area's air quality as commuters are stuck in traffic. And lead to longer journey times and yet lower productivity for the region. Calderdale is already failing to meet air quality targets and this plan will worsen the situation. The council seems to be directing traffic to the M62, which is already far too busy and often at standstill. Two thousand more homes in Clifton will create even longer traffic jams on the motorway and the approaches at J25. With other councils also planning to build around this and other motorway junctions in the area (such as J26 and J24), the combined effect is likely to bring the network to a stop. Has the council consulted with other councils about its plans, has the combined effect of all this building on the fringes of their areas been considered as a whole? What about the duty to co-operate? Before we even consider building on greenbelt all other brownfield sites and vacant parcels of land in urban areas should already be developed. On the Brighouse industrial estate, next to J25, we should be redeveloping to make better use of the land. If the businesses there built two-storey buildings and the area was better planned out, half of the site could be given over for new housing, solving any shortage of houses and meaning the greenbelt was preserved. There too is a question to be answered on why Brighouse and Clifton are taking so much of the new housebuilding in Calderdale? Why should Clifton village's greenbelt be sacrificed for 2,000 new homes when the seat of the council, Halifax, is only taking a similar number? This does not seem fair or sensible planning. Should the council not be encouraging the greatest growth in its biggest town, where most of its jobs are concentrated?

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 **Lpp1191**

Site ref (if applicable): **LP1463**

Person ID: **953986**

Name: **Mr Matthew Nicholson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

See attachments

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

Sound Reason:

See attachments

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

Duty to Co-operate Reason:

See attachments

Suggested Modifications:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5084421><http://calderdale-consult.objective.co.uk/file/5084420>

Comment ID **Lpp1199**

Site ref (if applicable): **LP1463**

Person ID: **1185143**

Name: **Mr John England**

Organisation:

Agent ID: **960827**

Name: **Emma Lancaster**

Organisation: **Quod Ltd**

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

Legal Compliance Reason:

Please refer to attached Representations.

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

Sound Reason:

Please refer to attached Representations.

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

Duty to Co-operate Reason:

Please refer to attached Representations.

Suggested Modifications:

Please refer to attached Representations.

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5096831>

Comment ID **Lpp1204**

Site ref (if applicable): **LP1463**

Person ID: **879392**

Name: **Mr Simon Shaw**

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 register my objections to the proposal to allow development on the Thornhills site at Brighouse. My primary objection is concerned with the impact to the local infrastructure, which is already struggling in many key areas, and in my opinion simply would not be able to cope with a development on this scale without significant improvements. Roads "" the main access to / from the site (the A643) is already heavily congested (in both directions) at peak periods, with lengthy queues building particularly towards Brighouse town centre in the morning rush hour (7.30 "" 9). Local roads (including Towngate, Westgate, Coal Pit Lane, Jayhouse Lane and Scholes Lane are already heavily used as 'rat runs' to avoid these queues and most of these are simply unsuitable for the additional volumes of traffic which would be generated. Further afield and despite upgrading it to a 'smart' motorway the M62 is again normally at a standstill at peak periods "" with traffic often queuing back onto the motorway itself to exit at Junction 25 at peak periods (5-6pm). I understand that the proposal for a Junction 24a (which is about the only option which would significantly improve this) has been postponed / dropped for the moment "" and there therefore seems to be nothing to address this. I think it is a reasonable assumption that a significant percentage of the residents at any such development would commute (as there aren't 4000 local job vacancies), with a large percentage travelling to / from Leeds. The recent traffic surveys were also largely conducted over the summer holiday period, and as such do not give a reasonable representation of the current levels of traffic for most of the year. Rail "" again at peak travel times the trains are already at capacity "" with the Brighouse station car park being totally full most day well before 8am, and standing room only on the majority of trains at peak periods. Again there seems to be nothing in the plan to address this as a viable alternative to driving. GP's / Dentists "" none of my family have been able to find a NHS dentist which is taking new patients within a 10 mile radius within the past 6 months, and there are often waits a 2-3 days for a doctors appointment. Again this scale of development would make this situation far worse. Schools "" Clifton school has a single form intake (and very little physical space to expand) and most years is fully / over subscribed. Other objections "" Loss of open space / amenity "" the area is very well used by many people for things like running , walking, horse riding, cycling and is one of the few reasonably safe places in the local area for these activities Air quality "" I understood that the air quality in the local area is already poor, and by increasing the number of car journeys, and generating a large amount of queueing traffic in the area this can only be made worse Unfair allocation / burden on one area "" the current plan seems to place an unfair burden on one area within Calderdale, for what appears to be mainly political reasons. Loss of Greenbelt / loss of village identity "" effectively the proposal would result in a massive loss of Greenbelt land (when there is still an ample supply of Brownfield sites) and will more or less merge Brighouse and Clifton into Scholes and Wyke with no real break in the urbanisations. Impact to wildlife "" the site is currently home to a wide variety of wildlife, including some rare species such as the Curlew.

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 **Lpp1395**

Site ref (if applicable): **LP1463**

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 LP1451 and LP1463 Garden Suburbs, Brighouse The exceptional circumstances for these major Green Belt changes have not been demonstrated. They would enable an unsustainable pattern of settlement with poor public transport and active travel accessibility, generate significant road traffic, skew the location of new housing away from centres of employment and undermine re-use of brownfield land. There would be significant loss of openness, and ecological and heritage impacts; these could potentially be partially mitigated by reduced quantity of development combined with Local Greenspace Designations, but such measures have not been proposed. The dependence on these two sites for the overall housing delivery in the Plan period is unrealistic, unsustainable and damaging to the soundness of the Plan.

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 **Lpp1411**

Site ref (if applicable): **LP1463**

Person ID: **1185995** Name: **Persimmon Homes (West Yorkshire)** Organisation:

Agent ID: **1185997** Name: **Mr Adam Jackson** Organisation: **Senior Planner Lichfields**

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

Undevelopable Allocations In addition to the significant shortfall in delivery which we anticipate will occur at the Garden Suburb sites, our analysis has highlighted a number of other proposed allocations which we believe are not developable. LP1463 Based on a proper application of the Start to Finish research, it is considered that the combined plan period yield from both Garden Suburb sites will be 1,484, at most. This represents a shortfall of 1,762 dwellings, and, as the PDLP does not have a sufficient flexibility allowance, would mean that the Plan would fail to meet the identified housing requirement. The PDLP is therefore not positively prepared and the approach is unsound. Indeed, a case could be made for lower site yields than those shown above, given the landowner issues at site LP1463 and the strength of the housing market area in which the sites are located, which would likely mean that the sites will be slower than average in their delivery. See attachment for context of comment.

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

Duty to Co-operate Reason:

See attachment

Suggested Modifications:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5106413>

Comment ID **Lpp1429**

Site ref (if applicable): **LP1463**

Person ID: **1185621**

Name: **Clifton Village
Neighbourhood Forum**

Organisation: **Clifton Village
Neighbourhood Forum**

Agent ID: **1185607**

Name: **Mr Nick Pleasant**

Organisation: **NJL Consulting**

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

Legal Compliance Reason:

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

Sound Reason:

See attachment for context of comment. Our previous representations (in 2017) are enclosed and the concerns raised in these representations remain, (previous representations at Appendix 1). The sites are supported by individual site assessment reports which consider site constraints and required mitigation. In the case of the Thornhills site (LP1463), the updated site assessment fails to adequately address a range of site specific issues in the previous Draft Local Plan and raised our subsequent representations to that draft. In summary, considering the previous representations and the evidence now presented to support the Publication Draft Local Plan: The sites are in the most sensitive area of Green Belt and no justification is given for their release; In particular, lower population projections indicate the proposed major housing allocations at Thornhills and Woodhouse are no longer required; Notwithstanding, major housing in this location will simply serve those working in Kirklees (Huddersfield) and other more distant locations such as

Leeds, Bradford and Manchester, and therefore result in wholly unsustainable patterns of growth; The sites will exacerbate existing congestion, with no readily implementable solution "" for example there is no evidence the necessary local highways infrastructure, such as improvements to relieve acute congestion on the A641, A643 and A644 can be delivered; There is equally as little certainty on essential strategic highways works to M62 J24, J25 and proposed J24a, all of which likely require Highways England funding. Highways England have confirmed no funding is available; There is a clear correlation between existing congestion (in the A641, A643 and A644 corridor) and areas of poor air quality, particularly in the Brighouse AQMA, and further development in this location will further exacerbate poor air quality; The proposed build-out rates are entirely unachievable due to land assembly, the need for up front early significant infrastructure, on site delivery of sustainable urban drainage solutions, developer funding, uncertainty of ground conditions including extensive historic mine workings, and viability concerns; Development is potentially unviable unless affordable housing policies are ignored and an almost zero CIL rate is applied; The sites contain valued ecological areas, including designated habitat and notable species such as Schedule 1 Species which have protection under the Wildlife & Countryside Act 1981 and associated high conservation priority; Therefore the promotion of these sites is entirely at odds with the Local Plan Strategic Objectives. The proposed allocations are entirely unsound

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

Duty to Co-operate Reason:

Suggested Modifications:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5107469>

Comment ID **Lpp1541**

Site ref (if applicable): **LP1463**

Person ID: **1182847**

Name: **Mr Andrew Pullen**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Not knowledgeable enough to comment

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

Sound Reason:

The number of planned houses for Clifton is totally disproportionate. The numbers speak for themselves. The concept of garden suburbs is unsubstantiated with any detail and sounds like window dressing. It is well documented that developers apply for revisions in planning permissions and, for instance, the required number of affordable homes in developments are vastly reduced. I am sceptical as to whether the concept would be delivered. The Site Assessment Report contains many factual errors and also appears to rely on desktop studies. Given the factual errors I have spotted how can we have confidence in the data used for the desktop studies. The factual errors I have spotted include: Topography - To describe the site as gentle undulations is inaccurate. The western part of the site has large areas of severe inclines and a number of ravines. Flooding - Conclusion - Henshaw Drain is in the Todmorden area. This has clearly been cut and paste from another site assessment Highways - The smart motorway scheme around Junction 25

has been completed and traffic flow has been improved. However stationary traffic is still an almost daily feature of the motorway. Closures are also still a regular feature. Both these facts cause regular local road chaos as vehicles seek alternative routes. There seems to be no capacity for the extra 10,000+ extra traffic movements this development would cause. Environmental Health - this mentions Turbines. These are not mention anywhere else in the document. Is this another cut and paste error. Other Factors: Landscape Character Area - K1 Thornton - Queensbury Makes no sense - another cut and paste error? Journey Time to General Practitioner - Less than 15 minutes. - Local GPs do not have sufficient capacity for the proposed extra persons so this assessment is inaccurate. Deliverability - Developable area 105.15 hectares - an overestimate given the actual topography. I am also concerned about the local wildlife and in particular bats which are not mentioned. I live on the south edge of this area. At twilight in summer months dozens of bats cross my garden in a north to south direction. It is obvious therefore that their roosts are within the proposed development area. Within the last year I have had several sightings of deer, foxes, badgers, weasels. I am also concerned about the lack of consideration of mine workings. Some are actually present on the map on the website. There are potentially dozens within the area. Within the last 20 years one of my neighbours had a mine shaft open up in their garden. Also not mentioned is the trackbed for the gravity railway which took coal from mines at Hartshead Moor down to Brighthouse canal basin. This traverses the whole site. This would be a tragic loss of a heritage earthwork. I strongly question the competence with which the Site Assessment has been completed and therefore the soundness of the Local Plan

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

Duty to Co-operate Reason:

No opinion

Suggested Modifications:

A complete re assessment as to whether this site is suitable for inclusion in the plan is required

Additional Evidence Link:

Comment ID **Lpp210**

Site ref (if applicable): **LP1463**

Person ID: **1119058**

Name: **Mrs Susan Minto**

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/5062628>

Comment ID **Lpp211**

Site ref (if applicable): **LP1463**

Person ID: **958215**

Name: **Mr Brian Minto**

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/5062623>

Comment ID **Lpp213**

Site ref (if applicable): **LP1463**

Person ID: **1182406**

Name: **Mrs Jenny Gates**

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/5063305>

Comment ID **Lpp218**

Site ref (if applicable): **LP1463**

Person ID: **1122742**

Name: **Mrs Jackie Haley**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I assume the Council has followed the required key stages, however I do not feel that the residents of Calderdale have been made aware of the scale of the housing developments, particularly in Brighouse. The general public seem to be unaware of the plans for Brighouse, therefore the duty to engage with the public and supply information has not been sufficient or effective. The residents of the Thornhills site were excluded from joining the recently created Clifton Planning Forum, why? We are the ones affected most. That decision meant we were excluded from community involvement. I don't have enough legal knowledge to say whether this was legally compliant or not but it was definitely not meaningful engagement.

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

Sound Reason:

The plan is definitely not sound on many issues: FLOODING - Contrary to the Council's statement in their report that "there have been no drainage issues reported in the past in the close vicinity" this is simply NOT TRUE!, Thornhills Beck, at the bottom of Jay House Lane, is flooded every year on numerous occasions, and subsequently closed off by the Council. This results in diversions onto Thornhills (single track) Lane. Also, the fields on Jay House Lane are regularly waterlogged for days after heavy rain. 2000 more houses on the proposed Garden Suburb/Estate can only compound the problem, and it is difficult to tell how the council will resolve this. AIR QUALITY - Brighouse is already an area of concern with regards to Air Quality (subject to AQMA) with levels of pollution already exceeding the Government's targets. Calderdale Council recently claimed in the Yorkshire Post Newspaper that they are committed to reducing air pollution - if so why are they proposing to build approx 4000 more houses very close to a heavily congested motorway junction and town centre?? Potentially this could result in 6000 more cars on the roads through Brighouse, as the public transport services are severely lacking. For example the train station car park in Brighouse currently only accommodates approx 100 cars. There is nowhere else to park. It takes approx 30 mins to walk downhill to the train station from this site but how many residents would want to take the very steep journey back? After having worked in Bradford, Wakefield and Leeds and tried both buses and trains for commuting, ultimately a car was the only viable option. With this lack of public transport there is very little chance of reducing air traffic pollution, unless the Council can supply us with electric cars! HIGHWAYS/INFRASTRUCTURE - Brighouse is already gridlocked on a weekly, sometimes daily basis. The roads are struggling to cope at present particularly at peak times. Both the proposed Garden Suburb sites are in very close proximity to M62 junction 25 (particularly the Thornhills site). Accidents, breakdowns, and roadworks are an every day occurrence, something that can never be mitigated against, and consequently the town centre of Brighouse becomes gridlocked resulting in traffic using the narrow by roads to avoid the town. Thornhills Lane which crosses the new proposed site is a single track Lane with blind bends with a sign stating "unsuitable for HGV's, however when the town is blocked, motorists/HGV drivers ignore this and use it anyway often at great speed. I have witnessed accidents involving children, pets and many road rage altercations. Jayhouse Lane/ Thornhills Beck Lane, also on this site, is a narrow

Lane with blind bends, also unsuitable for HGVs but again used as a town by-pass. Highways England site report states that this site "will have a significant traffic impact on the strategic road network " and that "development of this site not be commenced until later in the Plan period. Quite clearly they have deep concerns and reservations about the development of this site. GREENBELT/OPEN-SPACE/ECOLOGY - This site is rated as a highly sensitive greenbelt area and therefore all other options such as brownfield sites should be used first. A site of this size would wipe out almost all of the greenbelt in Brighouse, whereas, in the West of Calderdale there would still be a substantial amount of greenbelt left. At present this site has an abundance of wildlife, some of which are protected species, and is enjoyed by many walkers , cyclists, joggers, dog walkers, wildlife enthusiasts, and horse riders and as such is vital for the health and well being for the residents of Brighouse and beyond. The Councils report states RAG "No loss/No Impact to open space. REALLY!! So, 2000 houses won't have an impact on open space??? Summary I think everyone is aware of the need for housing and don't mind taking a fair share. But this plan is not only flawed but totally disproportionate (approx 4543 houses for Brighouse, 4400 houses for the rest of Calderdale). Yes, the topography of Calderdale brings difficulties for building, however there is land available in all areas and the housing allocations should be distributed more evenly. I feel the residents of Thornhills Lane have been singled out as we are in a minority and having watched the Webcam from the Councils meeting, which has been posted on this portal by another resident, I fully believe this to be the case. One councillor actually states "we had to get this plan done or it would be done for us by the Governments planning inspector, and should that happen my ward would have to take more housing! The meeting showed bias against the ward of Brighouse. Quite clearly there are some petty political wranglings taking place here instead of working together for the whole of the Calderdale community.

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

Duty to Co-operate Reason:

I do not feel there has been intelligent and effective cooperation between Calderdale council and Kirklees council. Both councils are well aware of the existing congestion issues around the M62 junction 25 and the Cooper Bridge roundabout, yet both councils are proposing large scale developments very close to these roads - Kirklees 2000 at the Bradley site and Calderdale approx 4000 at the Brighouse sites. Also, Bradford council has large scale developments around M62 junction 26, which is also a heavily congested part of the motorway. If compulsory purchase orders are enforced to obtain land, then that is not cooperation. Excluding Thornhills residents from joining the Clifton Planning Forum, again is not cooperation.

Suggested Modifications:

The plan needs to be re-assessed and the housing allocations distributed more fairly across the whole of Calderdale.

Additional Evidence Link:

Comment ID **Lpp263**

Site ref (if applicable): **LP1463**

Person ID: **1117460**

Name: **Mrs Doreen Lever**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Calderdale have still not met their Air Quality targets before the Local Plan comes into effect and yet they are proposing to build upwards of 2000 new homes on the green belt at Clifton. Said houses would generate at least double that number of cars - the majority using the Wakefield Road corridor from J25 of M62 to Brighouse centre. One of the seven Air Quality Management areas within Calderdale. A large part of the proposed area previously had extensive mining operations, not just open cast but deeper drift mining was undertaken. Has this been taken into consideration and fully investigated as to suitability of site for residential building/school building etc.

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

Duty to Co-operate Reason:

I am not aware that there has been sufficient cooperation/interaction with either Bradford or Kirklees councils. Especially important is the fact that Kirklees are also planning a really large development the other side of the M62 which will have a huge impact on J25 traffic with ongoing problems into and out of Brighouse which is already congested at peak times

Suggested Modifications:

The numbers of houses allocated in the zones should have been spread more proportionately across the whole borough. The allocation as it stands means that Brighouse has almost half the total number for the whole borough.

Additional Evidence Link:

Comment ID **Lpp267**

Site ref (if applicable): **LP1463**

Person ID: **1129358**

Name: **Mrs Rachel Kampaxi**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Calderdale Council's absurd suggestion that this Local Plan is sound by forcing sole dependency upon both of these Garden Suburbs (LP1451 & LP1463) is ludicrous. No consideration has been taken into account of local housing need spread across the borough within communities, on smaller quickly developable sites which already have the infrastructure required to sustain growth. This plan overlooks the major issues of multiple land owners, timescale, delivery partners, amenities, affect on local communities and is insupportable.

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

Duty to Co-operate Reason:

Suggested Modifications:

Essential modifications: Remove the allocation placed within the Garden Suburb proposal and revert back to the original, and well thought out, 2017 Local plan given by Calderdale's Spatial Planning team. This previous plan was expertly considered giving local people local housing across the borough as a whole, and gave opportunity for developments of all sizes in all areas, in various timescales. With regards to LP0683 (Land at Bank Top, Southowram HX3 9PB) the previous plan was for 60 properties and has now been forceably reduced to 12 due to the new proposed Garden Suburbs. Please see comments attached to that reference. By overriding a sensible and reasoned approach to Government requirements this new Local Plan is unsound.

Additional Evidence Link:

Comment ID **Lpp297**

Site ref (if applicable): **LP1463**

Person ID: **1126181**

Name: **Mr Dan Wells**

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?: **No**

Sound Reason:

It is difficult to understand the purpose of "Green Belt Designation" when the same Government that claims to protect it, then overrides the same designation to build properties upon. All the more frustrating when it is clear that Calderdale has plenty of Brownfield sites and disused building that could easily provide the same accommodation. Similarly, the plan has not adequately outlined how the additional burden of traffic along Highmoor lane, Thornhills lane and Clifton common will be accomodated

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 **Lpp304**

Site ref (if applicable): **LP1463**

Person ID: **1182303**

Name: **Mr Michael 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 Local Plan is totally disproportionate to the housing development of the Calderdale Authority Area as a whole, with Brighouse and Rastrick being 3.9% in area yet receiving 43% of all development. No indication has been given as to how the infrastructure will be affected and funded. With the proposed developments as above a massive impact will be felt in the town centre and local roads which are already gridlocked for most of the time. The road network cannot cope now, and frequently has to act as a relief valve for traffic diverted from the M62 when holdups occur in either direction. The education needs of the children have not been considered as the influx of these proposed developments will not be able to cope with these 'garden suburbs'. The medical services such as Hospitals, doctors and dentists have not been considered with all this proposed new development and its increased population.

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 **Lpp31**

Site ref (if applicable): **LP1463**

Person ID: **1062800**

Name: **Mr & Mrs M Badrock**

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?: **No**

Sound Reason:

The number of proposed houses on this site is totally disproportionate to the rest of Calderdale. The infrastructure in terms of highways, schools, doctors etc etc are inadequate and proposals do not deal with these aspects. Air pollution targets in the Brighouse area are already not being met. How does the council expect to hit targets whilst proposing the building of so many houses and a new industrial zone within the area? The Community Infrastructure Levy has a rate of £40 for this area compared to a much higher rate for other areas. How can this be sound given the points raised on infrastructure? Within this area there has been extensive mining in the past. Has this been fully investigated within the plan and are the Council certain that the land can be developed?

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

Duty to Co-operate Reason:

I have not seen evidence of consultations with neighbouring councils in particular in respect to Kirklees

where extensive development is also proposed close by. There has been mention of a new Motorway junction to try and cope with congestion but no evidence of when and how it will be funded

Suggested Modifications:

I believe the housing requirement should be spread more proportionately across the whole Calderdale area. This would help fulfill the infrastructure requirements and reduce the air pollution in one particular area

Additional Evidence Link:

Comment ID **Lpp365**

Site ref (if applicable): **LP1463**

Person ID: **1182862**

Name: **Mr Gareth Phillips**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The approach looks to disregard two significant points outlined in Calderdale Council's reports. The Statement of Community Involvement mentions clarity and ensuring it is easy for the community to be involved and comment on the plan. I personally believe this is not the case, with reports essential to the process not easy to access. A larger failing is with the Sustainability Appraisal - in 1.14 of Calderdale's Local Plan Sustainability Appraisal it identifies 5 aims: Living within environmental limits; Ensuring a strong, healthy and just society; Achieving a sustainable economy; Promoting good governance; using sound science responsibly. Environmentally the addition of a disproportionate amount of housing would lead to increased air pollution in an already affected area. In fact in February 2018, Calderdale Council's Cabinet Member for Planning, Housing and Environment, Cllr Daniel Sutherland, said: 'The challenge of improving air quality in the borough is not an easy one, but it's vital that we act now to ensure that we protect the health and well-being of our communities now and in the future. 'There isn't just one solution to tackling air pollution, it's reliant on a wide range of ideas, not only focusing on improving our road network, but also encouraging and improving our public transport offer and the infrastructure for walking and cycling.' Just Society - this implies a considered, balanced and appropriate level of benefits and allocations across the region. Not the case - political points scoring seems to be the approach employed (Labour council allocating highest numbers to non-Labour wards) as opposed to trying to identify what the best approach is for the whole of the region. Sustainable Economy - the allocation of the housing very close to the motorway therefore implies this will be a commuter belt for the M62 network. So unlikely to create an increase in local spend Sound science - previously published traffic monitoring has been during school holiday periods and away from peak periods. Essentially, the process is somewhat lacking in the aims set out by government.

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

Sound Reason:

One of the major concerns with regards to the excessive allocation is the impact on the local infrastructure. The local road network struggles during peak period and this is exacerbated with regular motorway issues. In July Calderdale Council's Cabinet Member for Regeneration and Economic Strategy, Cllr Barry Collins, said: 'The Council has ambitious plans for our road network, with approximately half a billion pounds of investment planned between now and 2022 for development schemes, infrastructure projects

and safety improvements" The majority of the road improvements are focussed on the Upper Calder areas with little investment or improvement in the region bounded by M62 Jtn 24, Jtn 25 and the A629. The idea of sustainable development also discusses improving walking and cycling options in areas. A difficult option to take up when roads are choked, busy and a source of high air pollution. A more balanced and appropriate level of allocation for the area would benefit the region as a whole. A further consideration of soundness is the environmental impact the additional housing will have. The area under consideration supports a large amount of valuable wildlife - deer, bats, curlew, lapwing among some of the many species regularly seen in the area. These habitats would be lost with this development. Finally, infrastructure of the area is not just road network. There will be increased pressure on local services such as schools and health services whilst the area has in recent months suffered regularly from problems with water supply; implying an old limited water network incapable of meeting modern day requirements.

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

Duty to Co-operate Reason:

Suggested Modifications:

A complete review of the plan with a focus less on political points scoring and more on developing a balanced allocation throughout the region which will support sustainable economic development throughout Calderdale as opposed totargetting specific areas.

Additional Evidence Link:

Comment ID **Lpp393**

Site ref (if applicable): **LP1463**

Person ID: **1129567**

Name: **Mr Sanjit Chaggar**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The local plan for the Thornhills, Clifton development is not legally compliant. There seems to be no concrete plan as to the provision of a safe community, and no involvement of the community already living in Clifton in the decision making process. The community already residing in the area have not been properly informed about this development, or the scale to which it could be. The proposed development does not appear to be an acceptable use of land, why build on greenbelt when there are many other brownfield sites that could be used instead? The development would be built on contaminated land, which may have been used for extensive mining, however the Council is not in possession of maps to show all mine workings. Is this not a legal requirement to find out if the land is fit for purpose? There doesn't seem to be sufficient information in the plan so far for a sound infrastructure. The plan has yet to establish demand, risks and costs, and there is no date for completion as yet. It is also out of touch with the realities of the politics surrounding air quality, which Calderdale is already one of the worst in England and needs improving considerably, which realistically could take years and years to be brought within legal limits.

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

Sound Reason:

The local plan is not a sound plan at all. There are so many questions still to be answered surrounding the development, the infrastructure, and the impact it could have on the existing area and community. There are still many 'holes' within the plan, with no concrete answers or ideas as to how the development will become. There is no consideration for the community already residing in the area. No solid plans on how to manage the already growing concern regarding air quality. No thought around supporting a healthy lifestyle, without the need for extra pollution, congestion and road safety issues from a new development. No solid plan for traffic control or the sustainable costs that would surround this. Lack of neighbourhood infrastructure including school sites, recreational and play areas, local centres, flood defences, hospitals and other health care facilities etc. No regard for Ecology, to protect rare species for future generations. There needs to be a definite plan for extra facilities and services needed to support a new community.

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

Duty to Co-operate Reason:

There has been no effort to co-operate with the residents already residing in the area to discuss ideas or concerns surrounding the new development. The plan proposes a major development but with a lack of infrastructure and unplanned or a not committed up to date delivery plan. For example, a new junction on the M62. 24a. is shown in the local plan. However, funding for this has not been fully established and nothing solid proposed, as Highways England have stated they will not fund this junction, however this would be critical in alleviating congestion in Brighouse. The Levy rate for Thornhills appears to be very low in comparison to other areas. It is important the levy has a positive economic effect on development and is used wisely on resources needed for a sound infrastructure. Has the rate been set so low to encourage developers? The plan states that the development will be a large high value project for developers, so why is the Levy rate so low? Also if the project is high value, and built on greenbelt land, the value of the houses will also be high, which are unaffordable homes to most people, and young families go on struggling to afford a place to live.

Suggested Modifications:

There are a lot of modifications to be made before the plan would be completely legally compliant or sound. To begin with, why is greenbelt land being used at all when there are other brownfield sites that could be used? The number of houses being proposed in this plan is unproportionate, and there is a lack of infrastructure to sustain this housing development. The number of houses needs to be modified in relation to the resources that already exist within the Clifton, Brighouse area. The number of houses proposed would require new roads and motorways for traffic control, which is also quite costly. There would also be a need for school sites, recreational and play areas, local centres, flood defences, GP surgeries and other health care facilities etc. There needs to be a definite plan for extra facilities and services needed to support a new community. These are all the modifications that are required for the local plan to be somewhat successful.

Additional Evidence Link:

Comment ID **Lpp418**

Site ref (if applicable): **LP1463**

Person ID: **1128118**

Name: **Mr Keith Melton**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Flooding The proposed site is largely agricultural / countryside in nature and following heavy rain or snow, large areas of standing water may be seen in the fields for some considerable time afterwards. Additionally, the beck at the bottom of Thornhill Beck Lane becomes flooded, often with the result that vehicles cannot safely pass through in either direction. Flooding in this manner would prevent access and egress to and from the proposed site by this particular route. After the heavy rain at Christmas 2015, there was also flooding around the roundabout at the bottom of Clifton Common, with this being due to the extent of swelling waters in the above mentioned beck. Currently much of the heavy rain water giving rise to this manner of flooding is absorbed by the land and released over time. In the event that the proposed development takes place, the absorbent land will effectively be covered with a hard non absorbent surface and consequently the water will need to be carried away by drain pipes. If the water is drained in this manner, it is envisaged this will be relatively fast flowing and need to be moved much more efficiently as there will be no absorption or slow release. Where would this surface water be directed in order to prevent flooding ? This problem does not appear to have been addressed in the Plan.

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

Duty to Co-operate Reason:

Suggested Modifications:

A plan detailing how the site can be drained needs to be prepared. This is not something which should be allowed to evolve as the development progresses. Given the serious nature of flooding, planning for prevention at an early stage is vital.

Additional Evidence Link:

Comment ID **Lpp419**

Site ref (if applicable): **LP1463**

Person ID: **1128118**

Name: **Mr Keith Melton**

Organisation:

Agent ID:

Name:

Organisation:

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 The roads in and around Brighouse are already congested with this becoming much worse at peak times. Even at off peak times there is always a queue of traffic waiting to exit the junction at the bottom of Clifton Common, with this being due to the sequencing of the traffic lights at the junction of Wakefield Road and Bradford Road. On days when there is an incident on the M62, which is fairly frequent, traffic leaving the motorway in an attempt to avoid the incident, often passes through Clifton and it is not uncommon for traffic to back up from the roundabout at the bottom of Clifton Common up to the

Armytage Arms at the top and beyond. At the same time traffic on Wakefield Road is often stationary from the same roundabout right back to Junction 25 of the motorway. In short, if there is an incident near to Junction 25, the traffic in Brighouse moves from being congested to gridlocked. Before any construction work begins, how do Calderdale proposed to ease the level of congestion which already exists? If nearly 2000 homes are to be built, all as proposed, it is anticipated there could be upwards of an additional 2800 vehicles (assuming an average 1.5 vehicles per household) leaving Clifton in the morning and returning in the evening. Since the roads into and out of Clifton can barely cope with with the traffic generated by the 850 homes already existing, it is unlikely these same roads and traffic management system would be able to cope efficiently with this volume of additional traffic, even if it is accepted that not all vehicles would take the route into and through Brighouse. Vehicles not travelling through Brighouse would either have to travel through Clifton Village or exit the junction at the top of Highmoor Lane, creating problems in the village itself and other areas, eg. Bailiff Bridge, Scholes etc. It is understood that a relief road linking a point at the bottom of Clifton Common and taking a route along the old railway to emerge at some point near to the McDonalds restaurant along Bradford Road has been proposed. This road, running along the bottom of the " Garden Village " is presumably going to be linked to the development and intended to take some of the additional traffic generated. At what stage of development of the " Garden Village " development will this road be constructed and where will the money for this come from, given the current budget restraints? There appears to be no detailed information regarding this in the Plan. Of course, Clifton is only one of the proposed sites for development in Brighouse. There are also several smaller sites and a further "Garden Village" development at Woodhouse, where the proposal is that over 1200 homes will be built. Taking this site alone, there could be another 1800 vehicles travelling along narrow, single carriageway roads to join Huddersfield Road, with a significant proportion of these travelling into and through Brighouse, further adding to the congestion. Traffic travelling in the opposite direction, ie., towards Huddersfield is likely to meet congestion at the Bradley Bar roundabout as Kirklees Council are planning to build a large number of homes in the Bradley area.

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

Duty to Co-operate Reason:

The projected traffic levels travelling into and through Brighouse will rise significantly if the Garden Villages are developed. Also, it is anticipated that this will, in part, add to the traffic levels travelling on Wakefield Road towards Junction 25 of the M62. Added to all of this will be the traffic visiting and leaving the proposed Business Park at Clifton. At the same time as the development work is taking place in the Brighouse area, Kirklees will be building a large scale housing development at Bradley together with housing and a Business Park at Cooper bridge. As a consequence of the Kirklees development work, the traffic levels will rise significantly and this will give rise to congestion problems at at Bradley Bar roundabout and Cooper Bridge. Clearly the joint Calderdale and Kirklees developments will, it is anticipated, create massive levels of congestion, something which it is felt should have been readily foreseeable and addressed if there had been appropriate co-operation between the two Councils.

Suggested Modifications:

Consideration should be given with regard to how the high levels of congestion already existing can be reduced before any construction work begins. Also, prior to any construction work, detailed plans should be made to deal with projected levels of vehicle movement after the Garden Villages have been developed.

Additional Evidence Link:

Comment ID **Lpp421**

Site ref (if applicable): **LP1463**

Person ID: **1106506**

Name: **Mr Kelvin Lawton**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Although I do not have sufficient legal knowledge to fully determine whether this Plan is legally compliant or not, I feel that it is legally flawed. I own a small piece of land within the boundaries of the proposed Garden Suburb in Clifton. At no stage before the publication of this Final Draft Local Plan has Calderdale Council contacted me (or nine other owners of neighbouring pieces land) to inform me of their plans, asked me about my thoughts and wishes or had any consultation with me. Up until I informed the Planning Department of this issue after the current consultation began, Calderdale had no idea who owned this land. How is this legally compliant, competent or efficient? It is an illustration of the unsoundness and possible legal non-compliance of this Plan.

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:

To discuss with all landowners who have pieces of land within the boundaries of the proposed Garden Suburb development in Thornhills. Clifton.

Additional Evidence Link:

Comment ID **Lpp424**

Site ref (if applicable): **LP1463**

Person ID: **949518**

Name: **Mrs Pauline Whittle**

Organisation:

Agent ID:

Name:

Organisation:

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 representations in respect of the Local Plan, the subject of this Public Inquiry relate to the allocation of New Housing Sites. In order to meet projected housing requirements within the Plan Period, reliance is placed on the development of two "Garden Suburbs", (References LP1451 and LP1463) both located in the south of the Calderdale Area. The developments of these areas as proposed would result in a

disproportionate provision of housing in the south of the Calderdale Area to the detriment of provision across the area as a whole. Further, the timescale of these "Garden Suburbs" would require substantial infrastructure provision in terms of education, health, transport and ancillary services, which would be undeliverable within the Plan Period, resulting in a significant housing shortfall in the Calderdale area as a whole. Such a scheme will not provide housing at a quick enough rate, due to slow sales rates apart from the huge infrastructure requirements, and therefore the Council will continue to have a lack of five year land supply, making the Local Plan not "sound". There is scant information or detail provided on how these Garden Suburbs would be implemented. There is no mention of other delivery partners being signed up to the Plan,(e.g.highway authorities, the Environment Agency, water companies) and no indication of a true timescale or when all the land, which I believe has multiple owners, would come forward. Circumstances beyond the Council's control could mean very lengthy delays. During which time smaller sites could be successfully developed elsewhere within the Borough. The Council's Objectively Assessed Need (OAN) is too low. The Option now put forward (previously known as Option B) is inadequate as it fails to recognise Calderdale's significant and consistent undersupply of housing, and does not give convincing evidence regarding employment growth within the area, or weather conditions which could seriously affect building developments over the Plan period. As such the Local Plan is not sound. The Local Plan submitted to Calderdale Council by its Spatial Planning Team in 2017, which the Council rejected, provided a balanced approach to meeting the housing requirements of the whole of the Calderdale Area. This Plan was fully researched and evaluated, taking into account all relevant factors, and should be the Plan that is adopted. When examining the Plan for Tests of Soundness, I feel strongly that the current Plan has not been prepared or based on a strategy which seeks to meet objectively assessed development, and also that this version is not justified as the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence. The Spatial Planning Team's Draft Local Plan 2017 gave a balanced portfolio of sites to deliver the housing needs of the Borough, and enabled delivery by both small and large housebuilders, in a relatively short timescale. The Council's approach to providing new housing sites as expressed in the Local Plan now before this Inquiry, relies upon the development of two Garden Suburb areas to achieve projected housing demand within the Plan period and is likely to prove undeliverable. It is ill-conceived and illogical, and I urge that it be rejected.

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

Duty to Co-operate Reason:

Suggested Modifications:

Take out the Garden Suburbs from the Local Plan and revert to the 2017 Plan, as prepared by the Spatial Planning Team, which gave a balanced portfolio of sites to deliver the housing needs of Calderdale, enabling delivery by both small and large housebuilders. Small pockets of green belt identified by the Planning Team for development in that Plan could then be released and developers could create homes in small communities where people wish to live. In the case of Reference LP0683 (Land at Bank Top, Southowram, Halifax, HX3 9PB) this would result in a potential 60 properties, instead of 12. (please see comments attached toReference LP0683).

Additional Evidence Link:

Comment ID **Lpp427**

Site ref (if applicable): **LP1463**

Person ID: **1128118**

Name: **Mr Keith Melton**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Environment It has been established that poor air quality adversely affects health, with this giving rise to increased levels of heart and respiratory diseases. Also, reported on the BBC News recently was a piece regarding research which had been carried out with the findings being that poor air quality is detrimental to mental health. In an item printed in the Brighouse Echo dated 30th August, 2018, it was reported that the life expectancy of people in Calderdale is below the national average. This information was provided by Paul Butcher, Calderdale Director of Public Health. Calderdale is one of 23 Local Authorities that have not met their air quality targets. If the proposed plan as a whole is adopted, the number of vehicles on the roads in the Brighouse area will rise significantly and this will inevitably give rise to increased levels of atmospheric pollution. This increase will arise as a result of the emissions created by queuing traffic which will negatively affect the air quality not only in Clifton but in the Brighouse town centre area generally. Also to be considered is any additional traffic congestion and associated pollution which will be generated if the proposed Business Park on Wakefield Road is developed. To be borne in mind is that there is no quick fix when unacceptable levels of atmospheric pollution are reached and this will have health implications for all the residents of Clifton and surrounding areas. In view of this, will Calderdale be taking any immediate steps to improve the air quality before the housing development begins and are there any planned schemes in place to take account of the additional emissions generated by the additional projected levels of traffic, since there do not seem to be any immediate plans to build the bypass road from the bottom of Clifton Common to Bradford Road? Even if the bypass is built, it seems unlikely this will be sufficient to deal with the air quality problem as a whole. In overall terms it would seem that Calderdale Council, who should have the the best interests of all the residents in the area at the heart of any decision making, have decided to go forward with a development scheme in one small area of the Authority where there will be a foreseeable increase in traffic congestion and hence air pollution. This particular area has already been recognised nationally as having poor air quality. Given this, it could reasonably be concluded that Calderdale Council have taken the easy way out by electing to build nearly 50% of their new homes in one small area, without giving due consideration to the health implications of the residents. Something which is totally unacceptable and short sighted.

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

Duty to Co-operate Reason:

Suggested Modifications:

For the health benefit of the residents in the Brighouse area generally, Calderdale Council should be required, as a matter of some urgency, to take any necessary steps to ensure the air quality is improved in line with nationally accepted targets. This should be done immediately and before any development work begins. Having established a regime whereby the levels become acceptable, the Council should then produce a plan to ensure that these levels do not rise with the increased traffic levels (and atmospheric pollution) which will occur with the development of the Garden Villages, Business Park etc.

Additional Evidence Link:

Comment ID **Lpp428**

Site ref (if applicable): **LP1463**

Person ID: **1128118** Name: **Mr Keith Melton** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Location As an area within Calderdale, Brighouse is relatively small and yet it has been decided that almost half of the new homes will be built here. In the case of the Garden Villages, it seems that the planners have simply identified two open areas of land in an already well developed area of the Authority and, without consideration of the effect this might have on the local communities, decided to fill these with houses. The level of development proposed for the Brighouse area is wholly disproportionate and it is considered that smaller developments throughout the whole of Calderdale (Mixenden, Ovenden, Illingworth etc,) would be a better solution to the projected housing problem. By spreading the housing over a wider area it seems likely that there would be less need to make major infrastructure changes, since the impact of development would be considerably less. This would of course require more effort on the part of the planning department. In the plan it is proposed that the Clifton Garden Village will be built on Green Belt land. Green belt areas are given that designation for a reason and that reason does not include housing development. There are many unused Brown Field sites in Calderdale and it is considered these should be developed before there are any moves to use Green Belt land.

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

Duty to Co-operate Reason:

Suggested Modifications:

Calderdale Council should give due consideration to spreading out the proposed housing over different parts of the Authority instead of concentrating nearly half of it in an area which is already well developed.

Additional Evidence Link:

Comment ID **Lpp429**

Site ref (if applicable): **LP1463**

Person ID: **1128118** Name: **Mr Keith Melton** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Open Space The proposed site is on Green Belt land and is probably the largest area of countryside which can be visited and enjoyed by Brighouse residents without leaving the town boundaries. The country lanes running through the proposed site are relatively level and accessible for everyone to enjoy, be it for walking, cycling, running, horse riding etc. To enjoy a similar area of countryside in the future, residents will have to leave the Brighouse area by car or public transport, something which may cause difficulty to older members of the community or those living on a limited budget. Also to be considered is the varied wildlife on the site, which includes curlews, owls, bats and deer. Clearly the habitat of these creatures would be destroyed with the construction of houses. Restating what was said in the section entitled 'Location', Green Belt land is not intended for housing development.

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

Duty to Co-operate Reason:

Suggested Modifications:

Whilst it is accepted that some development will be necessary in the Brighouse/Clifton area, the Council should make every effort to preserve as much of the Green Belt land as possible.

Additional Evidence Link:

Comment ID **Lpp430**

Site ref (if applicable): **LP1463**

Person ID: **1128118**

Name: **Mr Keith Melton**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Infrastructure With the introduction of housing on the scale proposed it will be necessary to provide the various services to support this. Thinking about the construction phase initially, there will be an immediate need for gas, electricity, water, telecommunications/internet and sewage services. Since it seems unlikely the existing network of services in the Clifton area will be sufficient to meet the needs of the new development, these will need to be installed prior to the construction of new housing. However, details of how this installation work will be planned into the programme of building works are not included in the plan. Given that the proposed development will not be completed until after 2030, is it Calderdale's intention to install the services for the entire development prior to the start of construction or will this be undertaken piecemeal in line with the annual build programme? It is anticipated the installation of such services, regardless of when carried out, will take a considerable time and cause severe traffic disruption to the traffic flow through Brighouse and Clifton. With the introduction of the proposed housing there will quickly be a need for the new schools, health centre, doctors/ dentists surgeries etc., which are shown in the plan. When do Calderdale propose to build these new facilities and how will they be paid for given the budget constraints on both Councils and the NHS, which are unlikely to be eased anytime soon. Also, who will be responsible for the creation and maintenance of the green spaces given the necessary costs

involved. Will the Council be providing new leisure facilities, something which will be required in order to promote an active lifestyle and good health? In total the population will grow considerably given the total number of new homes proposed in the Calderdale area overall. Are there plans in place to increase the capacity of the hospital, police, waste management services etc., in recognition of this.

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

Duty to Co-operate Reason:

Suggested Modifications:

Before any construction work begins, it is considered the Council should produce a detailed plan stating at what stage of the Garden Village development the different services will be installed and when the schools etc., and relief road will be constructed.

Additional Evidence Link:

Comment ID **Lpp438**

Site ref (if applicable): **LP1463**

Person ID: **1128488**

Name: **Mr John Barraclough**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

As a layperson, I am not qualified to endorse the legality or otherwise of the Local Plan

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

Sound Reason:

Notwithstanding the profound impact the proposed developments in Brighouse and Rastrick will have on an already inadequate infrastructure (the case for which has been made more than adequately elsewhere), equally importantly, in my view, is the lack of evidence to support the building of 4500+ in the town. The Local Plan would suggest that demand for housing in the area outstrips that in the rest of Calderdale, which clearly is not the case. Therefore, the only conclusion one can draw from this apparent mismatch is that many of the new residents will have to commute through Calderdale to their places of work. This will clearly lead to further congestion. But is this a true picture? I would advocate that developers are likely to be only interested in building so called 'executive homes' on what would be prime greenbelt sites, particularly so in the case of the proposed Garden Suburbs. Such properties are unlikely to be affordable for the vast majority of existing Calderdale residents but would undoubtedly attract buyers from outside the area! Whilst benefiting from the Community Charge such properties would do little to address the supposed housing shortage in Calderdale. As a consequence, Brighouse with its easy access to the M62, would increasingly become a dormitory town for the surrounding cities of Bradford, Leeds and Manchester.

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

Duty to Co-operate Reason:

I can see little if any evidence that the Local Plan has been discussed with the bordering authorities of

Kirklees and Bradford and the impact their respective policies will have on local infrastructure. Given the overwhelmingly disproportionate number of houses planned to be built at or around Junction 25 of the M62, this can only lead to further congestion on an already congested motorway.

Suggested Modifications:

Additional Evidence Link:

Comment ID **Lpp447**

Site ref (if applicable): **LP1463**

Person ID: **1126475**

Name: **Dr Christopher Savage**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

See Attachment

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

Sound Reason:

See attachment

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

Duty to Co-operate Reason:

See attachment

Suggested Modifications:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5070229>

Comment ID **Lpp449**

Site ref (if applicable): **LP1463**

Person ID: **1182127**

Name: **Miss Linda Burnley**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Loss of Amenity Residents, cyclists, joggers, dog walkers horse riders and ramblers currently enjoy the

fantastic landscape in this area. It is rural. It is agriculture. It is a living classroom for our children. Bird species I have observed include woodpecker, lapwing, buzzard, long-tailed tit, grey wagtail.... I question whether such birds would survive and prosper among garden suburbs. The opportunity to enjoy the wide-ranging views across the valley and beyond will be lost - forever. The pleasure and relaxation routinely enjoyed and appreciated by so many people of all ages from being in this countryside with its outlook and closeness to nature makes a significant contribution to mental health and well-being. This will be lost - forever. I also wish to highlight the detriment to air quality. There is also a physical health impact from the proposed development. We know that air quality in Brighouse is poor currently, that nationally agreed levels of pollutants are not being met. This proposed development means thousands of additional cars and increased level of pollution. Reduction in air quality is a serious threat to human health. Green Belt There is clearly a sense of outrage and incredulity regarding the use of Green Belt land for mass housing. I am staggered that all the reasons for Green Belt can so easily be ignored. National Planning Policy Framework states "the fundamental aim of Green Belt Policy is to prevent urban sprawl by keeping land permanently open" "the essential characteristics of Green Belts are their openness and permanence". If this goes ahead, the Green Belt between Brighouse and Clifton will be lost - forever. The village of Clifton and the Hamlet of Thornhills feel special. They should be retained and not lost in a sprawling urban development that merges all into an extended and over-populated Brighouse. The Council previously reviewed all Green Belt areas and classified this as "Most Sensitive Green Belt Parcel". Further comments were "The site performs an important role in safeguarding the countryside from encroachment". It now appears that taking the easy options for development, some crazy sense of a quick win is blatantly disregarding long-understood rationale and policy regarding Green Belt. This should not be allowed. There are brownfield sites and disused sites which could be regenerated in Calderdale to avoid the permanent loss of Green Belt. I note with great interest and pleasure that proposed development on Green Belt land in the Kirklees Local Plan has been removed from the plan and retained as Green Belt. This is land around Hartshead and Roberttown and land at Cooper Bridge - both just a mile and half away from Clifton. This followed recommendation by Government Planning Inspector. I very much hope therefore that a precedent has been set and that a halt will be called on misguided and reckless reclassification of Green Belt, allowing urban development on a massive scale and removal of beautiful countryside forever. Disproportionate Size of This Development The scale of development here and at other Brighouse sites is disproportionate. More than half of the proposed new houses in Calderdale are proposed in Brighouse. This must be questioned. The population of Brighouse will increase by approximately 50%. The impact on those impacted communities is significant and broad. Lives are being changed because of the dramatic increase in population (and all that goes with it). This is not necessary - there is land available across Calderdale and the housing allocation should be distributed more evenly to avoid such far-reaching impact on the lives of residents in this particular corner of Calderdale. Infrastructure Given that the proposed development represents such a dramatic increase in the population of Brighouse, the plan does not appear to have adequately understood or made a commitment to the investment required in schools, GP surgeries, shops, leisure facilities..... Highways and Congestion The motorways and roads around Brighouse already do not cope with the volume of traffic. As a daily commuter to Leeds, I am well aware of the motorway congestion around junction 25 of the M62 and onwards to Leeds. I work with colleagues who travel from the Manchester area; they bemoan the fact that traffic grinds to a halt at junction 25. Driver behaviour must be considered.... I know drivers who regularly look for alternatives to the snarled up M62, e.g. by coming off at junction 22 and attempting to travel through Ripponden, Elland, Brighouse. So the congestion in our gridlocked towns intensifies - not just because the proposed development will mean thousands more cars on the road, but because the knock-on impact of increased motorway traffic will bring vehicles on journeys from further afield into our towns and villages. The Highways England report recognises the "significant traffic impact on the strategic road network". This should not be ignored. Neither should the unsuitability of local access routes (single track) for the increased volume of traffic e.g. Coal Pit Lane past The Black Horse as obvious route from Clifton to M62 junction 25 and to A644 towards Mirfield, Huddersfield etc. Flooding Flooding is a common occurrence at the bottom of Jayhouse Lane - Thornhill Beck floods across

Welholme Park, Tesco car park etc. There are times when even for walking down Jayhouse Lane, Wellington boots are a "must" because the road itself becomes a stream/water channel for the rainwater and melting snow from the fields. The boarding kennels on Jayhouse Lane have been flooded. Building 2000 houses will significantly add to the problem because tarmac, concrete and paved areas will replace fields that can absorb and retain the water. This appears to have been ignored. This is another aspect of the plan that is not sound.

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

Duty to Co-operate Reason:

I am sure that required steps have been taken (absolutely mandated steps would not have been omitted). However, I do not believe true, meaningful engagement has taken place. I believe there are many residents of Clifton, Thornhills and beyond who are not aware of the massive scale of the proposed development. I would have included myself in that group until recently. Sufficient effort to communicate and increase awareness has not been made. In some instances it appears that "blockers" have been placed in the way (e.g. exclusion of Thornhills residents from Clifton Planning Forum). I have found the process for making comments quite difficult and complex - negotiating through the various documents and literature on the website to find just where to add comments, registering etc. was not easy. I'm sure many will have given up. I understand that the documentation and information from 2017 is there to ensure completeness and access to all relevant data. However, this is definitely not a user-friendly process. The web site issues were probably the last straw for some.

Suggested Modifications:

Retain Green Belt Use brownfield sites Distribute housing allocations more evenly across Calderdale to avoid such devastating impact in one area

Additional Evidence Link:

Comment ID **Lpp465**

Site ref (if applicable): **LP1463**

Person ID: **1128492**

Name: **Mrs Linda Melton**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Recreational The Prime Minister is said to be keen that local authorities keep land for its residents recreational use. The Green Belt land at Thornhills is just such a place. It is used on a daily basis by bird watchers, walkers, joggers, cyclists, horse riders, and when it snows its a good place for sledging. There is also a diverse collection of wildlife on this site, for example, deer, rabbits, moles, bats, curlews and owls.

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 **Lpp466**

Site ref (if applicable): **LP1463**

Person ID: **1128492**

Name: **Mrs Linda Melton**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

General Comment Why has Green Belt land at Thornhills, Clifton been earmarked for this development when there are brown field sites in Calderdale that could be used? I know the council has to build a certain number of houses as dictated by the government, but this should be done in a fair and proportionate way. The area of Brighouse covers only 3.9% of Calderdale yet we are to have nearly 50% of the new developments. Why can't we have smaller developments spread over the whole of Calderdale? Ideally these should be in areas that actually need the new homes. Clifton has grown steadily over the years with acceptable levels of development. The proposed development for Thornhills will be almost three times the size of Clifton and will transform the area beyond recognition, especially if we also have to contend with an Enterprise Zone as well.

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 **Lpp496**

Site ref (if applicable): **LP1463**

Person ID: **961958**

Name: **Crosslee plc**

Organisation: **Crosslee plc**

Agent ID: **1104252**

Name: **Mr Mark Eagland**

Organisation: **Peacock & Smith**

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

Crosslee notes that the Council is seeking to allocate a new garden suburb for 1,998 dwellings at Brighouse. Our client is concerned that the proposed allocation does not include any land set aside for employment in this large housing scheme. Such provision would help to provide for local employment opportunity for the occupants of the new homes and foster sustainable travel patterns. Para 72 of the NPPF indicates that when planning for larger housing schemes consideration should be given access to (inter-alia) employment opportunities within the development itself or in larger towns to which there is good access. In this context the Local Plan does not justify why the proposed garden suburb could not accommodate an element of employment land. The Lichfield Employment Land Study indicates that the demand for employment land is greatest where sites have good access to the M62 motorway and that accessibility to this key transport corridor is one of the Borough's main strengths from an economic perspective. The proposed garden suburb at Brighouse would have good access to the M62 and we therefore question the logic of not including land for B class uses within this draft allocation.

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

Duty to Co-operate Reason:

Suggested Modifications:

The proposed garden suburb at Brighouse should include an element of land for B class uses. If such uses are ultimately not provided for, then this should be justified by the Local Plan.

Additional Evidence Link:

Comment ID **Lpp499**

Site ref (if applicable): **LP1463**

Person ID: **967544**

Name: **Mrs Alison Temple**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Do you consider the plan to be Sound?: **Yes**

Sound Reason:

I support the council's policy to develop Garden Suburbs. This will enable adequate infrastructure and facilities to be put in place for future 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 **Lpp521**

Site ref (if applicable): **Lp1463**

Person ID: **1164742**

Name: **Mrs Janet Lawton**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I would like the Inspector to comment on the fact that small landowners within the prospective Garden Suburb development in Thornhills, Clifton have had no notification or discussion about Calderdale's intentions. I co-own a small plot of land which is used as an allotment, orchard and as an open green space. I do not wish for this to be developed. Calderdale Council are totally unaware of who actually owns the land which they intend to allocate for housing development. Legal? Democratic? Fair?

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

Sound Reason:

This Plan has no substance in it to address the following issues
Infrastructure There is nothing in the report which adequately addresses the question of a proposed infrastructure for this Garden Suburb and the nearby one in Woodhouse, Brighouse. There would be a need for increased local roads, health facilities, transport resources, schools, leisure facilities and this Plan fails to provide any certainty about this.
Environment The local environment will be destroyed in terms of the flora and fauna, the opportunities for local people to pursue leisure interests such as walking, cycling, running and horse riding in this tranquil part of Brighouse which is less than a mile from the town centre. The local ecology will be affected and the numerous footpaths, including the long distance Calderdale Way will have their routes turned into paths between housing developments. Air Quality Calderdale already has a massive problem in terms of the levels of air pollution, being above the national average. A Garden Suburb, along with other nearby large scale housing and employment developments will lead to an increase in traffic and further impact the levels of air pollution, contributing to increased physical and mental ill health. Disproportionality It is inappropriate to concentrate housing and economic development in one part of Calderdale. Brighouse and Clifton are relatively prosperous parts of Calderdale, compared to areas around central Halifax where housing and the availability of local work is much needed. The development of a Garden Suburb will not be to the benefit of existing Calderdale residents. This housing will be used by people from other areas who will commute out of Calderdale to their workplaces.

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

Duty to Co-operate Reason:

If effective co-operation had taken place with neighbouring authorities then surely the proposed developments in East Calderdale and the adjoining part of Kirklees would never have taken place. The burden on the local road system and on the people who will have to live through 20 years of construction and the erosion of green spaces could surely not be as a result of effective joined up planning development.

Suggested Modifications:

Abandon the plan for a Garden Suburb at Thornhills. Calderdale Council should properly engage with the Clifton Village Neighbourhood Forum to plan the appropriate and sensitive development of housing in this locality. Few local residents are against any housing development. It is the scale of this development which is an easy option for Calderdale to meet its targets. It will destroy valuable well used green spaces which will never be restored.

Additional Evidence Link:

Comment ID **Lpp531**

Site ref (if applicable): **LP1463**

Person ID: **1129509** Name: **Mr Anthony Pennington** 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:

When Calderdale Council proposed the plan it was clearly based on Kirklees Council & National Highways Agency building Junction 24A on the M62. National Highways have now said they will not sanction or pay for Junction 24A as it will not help & is not practicable, Kirklees Council have also made it clear they will not build or pay for Junction 24A as they say they no longer require it. Without Junction 24A the whole plan becomes impossible to deliver. Calderdale Council have either buried their heads in the sand or are deliberately misleading its residents by still claiming Kirklees Council will build Junction 24A. Without confirmation that the junction will be built the Inspector must throw out this plan ASAP before the incompetence of Calderdale Council costs its residents anymore money, it must of already spent hundreds of thousands on a plan that the overwhelming majority of residents do not want. The lack of consultation between Calderdale & the other local Councils & agencies is a disgrace. So much for democracy.

Additional Evidence Link:

Comment ID **Lpp550**

Site ref (if applicable): **LP1463**

Person ID: **1129509** Name: **Mr Anthony Pennington** 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:

I am opposed to the plan for the development of almost 2000 new homes & an enterprise zone in Clifton for several reasons. Why does Clifton require 2000 new homes? there is no evidence to suggest the village needs them yet other areas within Calderdale are desperate for new homes. Surely it would make sense to build them where they are needed. There is also 1.5 million square feet of empty warehouse space within a 3 mile radius of the site, every penny raised in rates will go directly to Leeds council. I can only assume the reason for building in Clifton is because there will be more profits for the developers as 90% of the homes will be built on greenbelt land. If the development is allowed the greenbelt will be virtually wiped out & the village of Clifton will be as good as gone along with the wildlife that currently lives there. The air quality in Calderdale is already 1 of the worst in the country yet Labour councillors seem to think building an enterprise zone & 2000 new homes will improve the air quality, apparently because they think everyone will be driving electric cars. Anybody who lives or travels around Brighouse Rastrick & Clifton will already be aware of the congestion we have to deal with on a daily basis, with another 2000 homes & an enterprise zone the area will be 1 of the most congested in the country. The fact that junction 24A is now not going to be built makes the whole plan impossible to deliver. The lack of consultation with Kirklees Bradford and the other surrounding areas who all also have major development plans is a disgrace, the work along Cooper Bridge in particular will have a major impact on Junction 25 & Brighouse. Calderdale have given no assurances with regards to the infrastructure that will be needed to sustain the new development, where & when will the Doctors Hospitals Schools Roads etc be delivered & who will pay for them. The failure of the council to charge a reasonable rate for the Community Levy will rob Calderdale of much needed funds. I have to question the motives of the Labour & Liberal councillors who are trying to force the plan through totally against the overwhelming majority of residents. Some councillors seem to be voting for the plan simply because it's not in their area so it does not affect them other councillors almost seem to be acting as lobbyists for the Developers. I would like to see a Freedom of Information request served on all councillors forcing them by law to divulge any payments or gratuities over £25 they have received from the developers. I would also like to see Clifton & Rastrick & Brighouse hold referendums with regards to leaving Calderdale & becoming either Parish or Town councils so they can take back control of their own futures as it is clear the current Calderdale council could not care less about them & is only interested in selling off all their land to developers.

Additional Evidence Link:

Comment ID **Lpp566**

Site ref (if applicable): **LP1463**

Person ID: **1128488**

Name: **Mr John Barraclough**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

As a layperson, I am not qualified to endorse the legality or otherwise of the Local Plan

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

Sound Reason:

Community Infrastructure Levy It is widely recognised that if the two 'Garden Suburbs' planned for Brighouse were to go ahead, this would place an intolerable burden on existing and already inadequate infrastructure. Against this backdrop, one has to question why CMBC has elected to set the CIL at £40.00/m², in stark contrast to other areas in Calderdale where the charge is more than twice this figure. Given that nationally greenbelt development land typically attracts a CIL of £65.00/m², this appears not only profoundly unfair but a calculated attempt on the part of the council to encourage developers to focus house building in the lower valley. No doubt the council would argue that given the sheer size of the planned developments this would generate a proportionally larger cash injection into local authority coffers. This would undoubtedly be the case, but without any apparent requirement or indeed commitment on the part of the council for these funds to be invested solely on infrastructure projects in Brighouse. I have no wish to appear unduly cynical, but on past performance it's difficult not to conclude that this will again be the case.

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

Duty to Co-operate Reason:

I can see little if any evidence that the Local Plan has been discussed with the bordering authorities of Kirklees and Bradford and the impact their respective policies will have on local infrastructure. Given the overwhelmingly disproportionate number of houses planned to be built at or around Junction 25 of the M62, this can only lead to further congestion on an already congested motorway.

Suggested Modifications:

Additional Evidence Link:

Comment ID **Lpp594**

Site ref (if applicable): **LP1463**

Person ID: **717694**

Name: **Mr Edward Spivey**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

NPPF clearly states that the Plan must be evidence-based. The Council's own evidence shows clearly that the greatest need for additional housing is in Halifax - and that there is relatively little need for additional housing in Brighouse. Instead of allocating land for housing in Halifax, the Council has allocated a huge amount of land for housing in Brighouse. Put simply, this is contrary to their own evidence base. (it should be noted that the Council's own report showed there to be alternative mixes of development available - but the Council chose to ignore them and stick to its "garden suburbs" Policy. The Council supports "sustainable development" but by its own definition, this allocation is not sustainable. It does not enhance the environment, instead it destroys it, and so it fails the test.

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

Sound Reason:

Not only is the principle of the garden suburb flawed, the detail of its consideration is also flawed. The feasibility study has many deficiencies. It says the development relies on the major road running through it

(perhaps to be called the Brighthouse By-pass) but then states that a huge proportion of the dwellings could be developed without it - but offers no evidence for the assertion. In reality, without the By-pass, access to the development would rely on three roads: Thornhills Lane from the south east - this is a road of less than 5m width with no footways. It has two blind bends near to the former isolation hospital. It has enough difficulties providing access to the settlement of Thornhills as it is. To suggest that it could accommodate additional traffic is ridiculous. Jay House Lane, to the north east - this is a road of less than 6m width with no footways. It has a blind bend immediately prior to its junction with Walton Lane, where there is significant evidence of vehicles overrunning the kerblines. To suggest that it could accommodate additional traffic is ridiculous. Thornhill Briggs Lane, to the south west - this is a road of less than 6m width with no footways, which crosses Clifton Beck at a ford and then has a blind bend. Its junction with Bradford Road is notoriously difficult to navigate. To suggest that it could accommodate additional traffic is ridiculous. So how is the site to be accessed? The By-pass road shown in the feasibility study leaves Bradford Road approximately opposite McDonalds and meets Clifton Common opposite the sandwich shop. But, there is only a very small gap in the development on the east side of Bradford Road - and that is only because Clifton Beck crosses there. There is certainly not sufficient gap to accommodate a major road junction. So, the proposals must be to demolish current industrial premises (has any of them been contacted by the Council? - no), and to culvert the Beck (has the permission from the Environment Agency been sought? - no.) Should not the true consequences of this road be included in the Plan? The Council will try and hide behind NPPF stating that the first 5 years only needs to be addressed in detail - so up to 2024 - and in its (draft) Infrastructure Delivery Plan it is shown as not being needed until 2025 - one year later. So by this slight of hand, the Council seeks to slip the Policy through without having to justify its full consequences to the people who are most affected by it. At the other end, the proposal is to end the By-pass at the bottom of Clifton Common. But even Calderdale Council could not seriously consider this as an option. But of course, they are not. They intend to build a bridge, a flyover, over Clifton Common. Where is that in the Local Plan? - nowhere. Have the Council contacted the people who live at the bottom of Clifton Common and who are going to get a flyover taking traffic past their bedroom windows? No, they have not. In fact it is not mentioned in the Local Plan at all - nor in the Infrastructure Delivery Plan. Again, by not having any detail, the Council seek to avoid debate and opposition and to sneak the Policy through. Thus, when a planning application is submitted (by the Council) it will all be too late for anyone to Object - because it will be Policy compliant. Fait accompli. Laughably, the feasibility study notes the bus services on Bradford Road and Walton Lane and suggests that these make the proposals accessible by public transport. IHT guidance (now accepted by everyone) notes that a bus stop has to be within 400m to be suitable - 300m is better still. Virtually none of the allocation is within the distance. And, remember that none of the roads in the area has any footways at all - so pedestrian usage is dangerous. Also, given the topography and the steepness of the hills, accessibility for walking and cycling is non-existent. Therefore, the site is not accessible by sustainable modes of transport. The Council has no real idea of how the by-pass would be funded. In the Infrastructure Delivery Plan reference is made to the West Yorkshire Plus and Developer Funding. But so does virtually every other item in the Plan. It is unrealistic to expect the WY+ mechanism to be able to fund all the infrastructure, and so it would be left to developers - and the Local Plan shows no details of how that could be achieved. The feasibility study shows a requirement for two schools. When are they to be built? The Policy does not say. Clearly, such facilities need to be provided as part of the development, not as after-thoughts.

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

Duty to Co-operate Reason:

The Council's failure to consider Kirklees MBC's development proposals as well as its own are shown in their total reliance on the M62. All Calderdale's housing allocations and employment land in Brighthouse, coupled with Kirklees's allocations in Mirfield and Bradley, will all funnel traffic to the M62. Calderdale's IDP notes junction 24A, but Kirklees has stated that they will not be building it (and it is situated in Kirklees,

so Calderdale cannot build it themselves). Highways England have reported that the M62 cannot cope with all the traffic generated by these developments. Its report considers all the possible improvement schemes at junctions and on the main line, and still concludes that the section of M62 between Brighouse and Leeds will continue to become more congested, traffic speeds will continue to slow, and pollution levels will continue to rise. The lack of cross-border co-operation has meant that Kirklees and Calderdale are both adding traffic to the same section of M62, which is already overloaded, and no-one has come up with any solution to the problems so created.

Suggested Modifications:

Remove this housing allocation and allocate more land around Halifax for housing.

Additional Evidence Link:

Comment ID **Lpp600**

Site ref (if applicable): **LP1463**

Person ID: **1128167**

Name: **Mrs Janet Smith**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Like most people commenting on the local plan I am not legally trained and would like to trust that Calderdale Council would ensure the legal compliance of this plan, however I believe that the overall lack of awareness of this plan by Calderdale residents reflects the lack of involvement of the community. There has been very little publicity of the the plan in the media and minimal direct communication with the residents of Calderdale. The information available has been hard to navigate and only available to people who know to go looking for it. I don't believe that the vast majority of Calderdale residents even know there is a local plan, let alone the impact it will have on their day to day lives if it goes ahead. I can not identify how the council has made reasonable attempts to provide this information to all it's residents nor to those with intellectual and health disabilities to actively involve the whole of the community of Calderdale. It is this lack of effective publicity which leads me to believe it is not legally compliant.

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

Sound Reason:

The disproportionate allocation of the majority of the housing growth being assigned to Brighouse does not meet the need for housing growth throughout Calderdale. Confining so much of the development to one area does not provide social equality or equally share the potential for economic prosperity within the whole of Calderdale. Focusing so much of the development in one area inhibits regeneration of other parts of Calderdale and puts unnecessary strain on the services of the the town of Brighouse. In doing so the character and distinctiveness of Brighouse will be lost especially as it's green belt designed to prevent such urban sprawl will be lost to mass development. With such large scale development in one area it will not be possible to maintain and protect the environment surrounding Brighouse. The reports even admit the the ecology impact assessment is insufficient, doesn't include bird reports and has no consideration of wildlife life reports. It is unjust to exclude the benefits of the wide open spaces surrounding the Thornhills Lane area simply because the farm land is privately owned. The access to views, clean air, quiet environment, ability to observe nature without driving from the east of Calderdale provides walkers, horse riders, cyclists, families, runners and dog owners immeasurable health benefits. If Thornhills lane were

surrounded by houses and congested by cars it would be impossible to recreate any comparable alternative open space and would have a negative effect on fitness and mental health of the residents in the east of Calderdale. The loss of this area along with the addition of 2000 dwellings on greenbelt land so close to a town centre and the M62 would have a detrimental impact on the air quality and risk an escalation in the already high number of deaths in Calderdale attributable to air pollution. I was unable to find information of any traffic surveys which surely should have been preformed at a preliminary stage of this process. It appears that the Thornhills lane development will be reliant on a service road from the Clifton Enterprise/Business Zone which looks likely to be granted permission simply to be able to piggyback the development of the Thornhills lane area on it. Has the area for the enterprise zone been considered for housing rather than industry or will Calderdale Council be benefitting from the business zone to provide it's infrastructure and as such has "overlooked" this area for housing? Doing so will sacrifice a much larger greenfield area than otherwise necessary and provide developers with land which is easier and more profitable to develop than the many brownfield sites which remain unscrutinised. The plan to provide a road form the bottom of Clifton Common to Baliff Bridge across the unstable fields below Thornhills Lane will put a boundary to wildlife between the wood area behind Welholme park and the Thornhills area preventing the natural route the deer, bats and birds are regularly following. The ecological impact of this and the loss of the hedgerows should not be underestimated. The increased flood risk to Brighouse with such development in the area also needs to be taken seriously and not forget that the areas of Brighouse were also brought to a stand still by the Boxing Day floods. For this plan to be sound it needs to be justified when considered against reasonable alternatives and based on proportionate evidence. Despite the multiple reports there remains inadequate ecology reports, traffic surveys, air pollution reports and lack of a clear published infrastructure plan. Reasonable alternatives would be to allow development across the whole of Calderdale and not focus it all in the area of Brighouse. Proportionately spreading the development throughout Calderdale would allow all services to expand rather than put excessive strain on services, congestion, air pollution, flood risks and lose the identity, character and distinctiveness of Brighouse.

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

Duty to Co-operate Reason:

Watching the Calderdale councillors debate the local plan gave the impression that many councillors just wanted a speedy solution that didn't significantly impact on their constituents and as such outvoted the areas being disproportionately effected. There was little debate or scrutiny during this part of the process. Meanwhile residents being effected by the plan living in the Thornhills Lane area were prohibited from joining the Clifton Forum because the council requested the boundary of the forum to exclude that area.

Suggested Modifications:

Publicity and provision of information to all residents of Calderdale Proportionate allocation of housing for the whole of Calderdale. Thorough ecological surveys. Traffic and emissions surveys.

Additional Evidence Link:

Comment ID **Lpp601**

Site ref (if applicable): **LP1463**

Person ID: **1130791**

Name: **Miss Jo Green**

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?: **No**

Sound Reason:

The garden suburb sites for Brighouse will need substantial infrastructure improvements. However the plan is not clear on how these necessary developments will be funded? Access roads, schools, doctors, dentists and many other additional services will be needed due to the increase in population but the plan is unclear as to how these services will be provided. The Clifton suburb will result in a massive loss of green belt space, which once developed will be a loss to the countryside which can never be rectified once developed.

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

Duty to Co-operate Reason:

I do not believe that Calderdale Council have negotiated with neighboring councils Kirklees and Bradford when considering the full impact of this development. With the proposed development of 1800 houses at Bradley Golf Club, the Brighouse Enterprise Zone and Clifton suburb will lead to a massive increase in traffic at an already busy junction 25 of the M62.

Suggested Modifications:

Additional Evidence Link:

Comment ID **Lpp61**

Site ref (if applicable): **LP1463**

Person ID: **232440**

Name: **Mr Philip Thomas**

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 register my concerns and objections to these proposals described within the Calderdale Local Plan on the following grounds. My first reaction is that it is disappointing that the Clifton Village Neighbourhood Forum, that is recognised by Calderdale Council, only includes the area of Clifton Village to the one side of Highmoor Lane / Walton Lane and includes a Golf Club, and not included is the Hamlet of Thornhills, and the main area under threat from this proposed development, is on the other side of the Highmoor Lane / Walton Lane Roadway with Thornhills Hamlet at its centre. A formal objection and review of this decision must be considered. a. There needs to be a strong element of trust between the Residents of Calderdale, and Calderdale's Elected & Appointed Officials employed to make decisions on our behalf. There have been, over the years, many applications for development of one sort or another in this unique area of Thornhills Hamlet and surrounds. Calderdale Planning Department have maintained a consistent

policy on these applications and refused approval. In a number of cases appeals have been lodged and Calderdale Planning Departments decisions upheld at these appeals. Any residential redevelopment within the Hamlet that has gained planning approval has been by converting existing farm buildings, barns etc., into residential homes. My Wife & I have lived in our property for around 45 years, there are others in Thornhills Hamlet who have lived here even longer, and we all expect the level of trust and responsibility shown by the Council & its Officials to be consistent and long lasting. I hope this trust and consistency can be maintained and this potential loss of Green Belt / Agricultural Land is not considered and approved. b. It has recently been reported in the press and on Television that many Authorities within the Yorkshire area including Calderdale have met their targets for new build housing and there is no necessity for additional housing particularly in the Lower Calder Valley. c. Even in the current financial situation the number of houses / apartments for sale within the Brighouse area suggests that there are sufficient properties available for residential purposes. d. The proposed area for this housing development, off & near Thornhills Lane is visible from the middle of Brighouse and from the opposite valley slopes as an area of green countryside that opens up the whole aspect of the town as a result of its position. Covering this whole area with houses, and industrial buildings, will have a detrimental visual impact on the whole Brighouse community. e. Thornhills Lane / Thornhill Beck Lane / Jay House Lane area gives the opportunity of wide ranging views across and up the Lower Calder Valley. The Calderdale Way Footpath follows Thornhills Lane and crosses through the site of this whole proposed development. These Lanes are used as a view point by many to survey the local scenery, the proposed developments will remove this opportunity for ever. f. There are rights of way and footpaths indicated on maps of this whole area of proposed development, including the Bronte Way, the minor rights of way appear not to be indicated on the proposed plans. Some of these paths have fallen into disrepair. Will these footpaths be retained and allowed to continue in use when 2000 house are built here? . g. The current utility infrastructure will not, it would appear, support additional new development. There is already a problem with the provision of electricity to the area with regular blackouts as a result of overland provision of electricity. Those of us living in Thornhills Hamlet experience lengthy periods without electricity & this has become a regular local feature. Every winter for the past 40 odd years we have at least two blackouts due to weather conditions. New business and housing developments will not accept that standard of service. h. Water & Sewage similarly pose problems; we are reliably informed by the Utility Companies that the pipes and services for this area of Thornhills Hamlet are being used to their maximum at the moment without the addition of developments of this nature. i. Local services are already stretched to the limit. The Clifton Village School is over subscribed with little scope to expand to take the number of students that over 2000 houses would generate. Other services such as Shopping, Public Transport, Health, Doctors Surgeries etc., are similarly stretched. There is no village shop in either Clifton Village or Thornhills Hamlet. New provision will need to be put in place before such a housing development could be considered. j. There is very much a Hamlet feeling about Thornhills, and a Village attitude about Clifton, these are unique community reactions that should be retained not lost as a result of un-necessary expansion. In Thornhills Hamlet no residential property faces another residential property across the Thornhills Lane, none of the properties on the Lane are overlooked by other residential properties. This gives the Hamlet and very unique feeling and living experience. k. This is an area that is unique. It is very much appreciated & enjoyed as a Community resource by those of us who are fortunate the live here, and those who come to visit the area for rest and relaxation by walking, cycling or horse riding the lanes. Walkers, Horse riders, cyclists are regular daily addition to the local scene, this opportunity will be lost within the 2000 houses that are being considered to be build here. l. I am sure the Planners & Decision Makers will recall 1976 the Summer when tankers were delivering water to Scammenden Dam and the decision to build a piped water support system from Keilder Reservoir to help with future water shortages. It will be recalled that the main water pipe was laid across the fields & across Jay House Lane not far below the ground surface level. I watched this being built. To complete this task the railway embankment that used to take coal trucks by rail from the Clifton Pits to the canal in Brighouse was demolished and rebuilt when the pipe was laid. This embankment was regarded as a significant historical feature that was to be protected at all costs. This proposed building of 2000

houses will remove this embankment for ever and another piece of local history lost. It goes without saying that some of the mine shafts, spoil heaps and open cast workings still exist in the area that will cause significant disruption to development and potential risk to future resident safety. I sincerely hope that you will not give approval to these developments that will take away an area of green belt that is a visual, social, historical and recreational attraction to the BRIGHOUSE COMMUNITY as a whole and once lost cannot be replaced. According to published material to support this Local Plan it would appear that a New Junior & Secondary School are planned, these along with 2000 houses and all the support utilities & services, Water & Sewage, Electricity, Shops, Doctors, Improved Bus Services etc., etc., will lead to quite an upheaval and disruption of the local Community and none of it appears to be necessary to improve the housing stock of the area. I would like to finish by reiterating one of my earlier comments " | " | .. There needs to be an element of trust between the residents of Calderdale and Officials, like yourself, employed to make decisions on our behalf. There have been, over the years, many applications for development of one sort or another in this unique area. Calderdale Council & its Officials have maintained a consistent policy on these applications and refused approval. In a number of cases appeals have been lodged and Calderdale Planning Departments decisions upheld at these appeals. I hope this trust and consistency can be maintained. I hope you will make a decision to reject the Local Plan and work rather so that the Council will retain and enhance the area for the benefit of all Brighouse 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

Site ref (if applicable): **LP1463**

Person ID: **1123386**

Name: **Mr James 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 do not consider that the Local Plan to be Sound for the following reasons: I do not believe the local plan takes into account in any significant manner, any of the major areas of adaptation required. I do not believe that the consultation has influenced site polices, the feedback received by the council from the consultation has led to no changes. It appears that the concerns contained in the feedback have been totally ignored and the major areas of adaptation that are required have not been addressed. The strategy does not meet objectively assessed development and infrastructure requirements, including the requirement to liaise with Kirklees and Bradford Authorities (where it is reasonable to do so and consistent with achieving sustainable development) which Calderdale have not done, as highlighted in the expression of Highways England Concern's. The plan is not deliverable in the timescales stated due to the joint working needed between local councils, this does not seem to have been worked on by cross boundary co-

operation. Further the infrastructure required has not been assessed in its entirety. Lack of justification "" the strategy when considered against the reasonable alternatives (based on proportionate evidence) is not the most appropriate. Green belt land is being decimated to build an industrial park which is not needed evidenced by the number of industrial units vacant in the locality of the proposed site. Neither is the site in appropriate place due to environmental, noise and ecological factors. The plan is not consistent with national policy, it does not deliver sustainable development in accordance with the policies in the Framework. It has not taken into account, in the area of Thornhills and Clifton, many of the main elements required for the strategic plan: A Resilient Low Carbon Economy; Improved Health and Well Being; Preserved and Enhanced Natural Landscape; Everyone Involved. Further in terms of the council's duty to cooperate I submit the following views: The council have made it very difficult for residents to make representations. The system of how residents must respond to consultation of the document it appears to have been made purposely complex, labour intensive and near impossible for those who are not computer literate. Furthermore, deadlines on each occasion have included the school summer holidays making the timescale shorter and more pressurised for working families. Also, the councils attempt to divide the Clifton forum by removing the Thornhills residents from those in Clifton (Clifton residents firmly include Thornhills in the boundary of Clifton) why would the council wish to divide the area accept to suit themselves and divide the united residents! DISPROPORTIONATE Although recognizing the importance of the need for more housing I cannot understand the proposal passed by Calderdale Council to build 1998 houses in the area adjacent to Clifton Village as this is totally disproportionate as I believe Thornhills/Clifton are taking on around 48% of the total number of houses planned for the whole of the Borough whilst Thornhills/Clifton represent only 3.9% of the Calderdale land area. The Garden Suburb plan is disproportionate weighted to build houses in an area that already has severe congestion, an aging population and a limited need for social housing as it is not in an area of highest deprivation, within the borough. Furthermore, by radically reducing the greenbelt and the lack of provision of credible infrastructure revealed in the local plan, the residents would no longer have the access to (direct from the plan): 'enable and support healthy lifestyles, especially where this would address identified local health and well-being needs "" for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.' 'anticipating and addressing possible malicious threats and natural hazards,' The Council has not responded adequately to the comments and concerns made in 2017 regarding protecting the ecology of this site. The plan states that there is insufficient ecological information to identify the impact of development of the site. Surely a plan should be halted instead of continuing to undertake the development an area where this information is unknown. A garden suburb should provide lots of open space and natural areas. The Council has not provided explanations of how it will protect and support the biodiversity? Ecology: the site has both river and lowland woodland, both UK BAP priority habitats; grassland and a section of disused railway are within the Wildlife Habitat Network. I do not believe there is sufficient information in the plan to overcome this constraint. Therefore, the plan is not sound or effective. Further the protection of wildlife, including a number of different rare wild birds in this area, has not been addressed. This disproportionate plan to build such a vast number of houses further impacts the heritage of the historic village of Clifton. The Council has not shown that it has fully explored other options such as greater use of brownfield sites and a more considered and equitable distribution of development throughout the borough. AIR QUALITY Defra's modelling of roads in Calderdale in December 2015 provided statistics that several of Calderdale's roads, including the A644 Wakefield Road from the centre of Brighouse via J25 of the M62 to Cooper Bridge; directly adjacent to Clifton Village; provided annual average levels of NO₂ of between 40 and 60ug/m³ (micrograms per cubic metre) as at 2015. Clearly the building of thousand more homes and therefore a significant increase in traffic pollution can only exacerbate this negative impact on the health and wellbeing of residents, particularly those whom are elderly or children. The two main causes of lung disease are smoking and air pollution. Between 2012 and 2014, Calderdale was ranked 122 out of 149 local authorities with one of the highest rates of premature death due to respiratory disease. Pollution and road safety issues that discourage physical activity, e.g.

walking and cycling, are also therefore linked in this matter and increase the concerns. As quoted in the National Planning Policy, the purpose of the plans are to promote healthy and safe communities. Further, Calderdale Council itself makes the following admission regarding its air quality strategy; The principal challenges and barriers to implementation that the Council anticipates facing are: Developing novel solutions with limited financial and staffing resources. How will the council be able to achieve this challenge to provide acceptable air quality with increased development when it has consistently failed to do so up to this date? As recorded in a recent high court case Calderdale is one of 23 councils in England that is yet to meet its targets and the case highlighted the severe concerns and fluid timescales as how it will tackle the already poor air quality now, never mind when the proposed extra pollutants from thousands more cars and houses are present. Infrastructure Calderdale Council have not provided a clear and workable delivery plan. How will the Council improve existing traffic congestion in the Brighouse & Clifton Common areas? How will this congestion be further managed when an estimated extra 4,000 plus cars reside in the area? Highways England has expressed concern about the scale of development proposed around the Brighouse area and in neighbouring Kirklees. 'signalisation and localised widening of Junction 25 is unlikely to be able to increase capacity to the point that all these new trips can be accommodated and therefore a more significant intervention is likely to be required'. The impact of the vehicles wanting to join the motorway at J25 and inevitably using the minor roads through Clifton to do so, gives great cause for concern. The implications for road safety in the village and the safety of primary school children has not been addressed. Another great concern regarding infrastructure is the provision of schools, doctors, dentists, Open space, recreation and play areas. Centres within each neighbourhood including serviced sites for community use. Utilities; Superfast broadband etc.etc. The Garden Suburb plan is disproportionate weighted to build houses in an area that already has severe congestion, an aging population and a limited need for social housing as it is not in an area of highest deprivation, within the borough (see my comments on radically reducing greenbelt above). A garden suburb as defined should provide open spaces and natural areas that can support biodiversity with more tree planting and allow rainwater to infiltrate naturally. That already exists in our area until threatened with being destroyed in the local plan by the building of the "'Garden Suburb'. Community Infrastructure Levy The Community Infrastructure Levy (CIL) at £40 for this site appears to be more attractive to developers to use this area. How has the council arrived at this rate? It is particularly perplexing considering the massive amount of infrastructure required in this development. Can the council explain why Hebden Bridge has a levy of £85? How has the council arrived at this differential of rates? Will this CIL be ring fenced and used solely for infrastructure in this development or will it be used in other areas of the council authority? How are the council going to meet the increased demand in infrastructure for the vastly inflated population? As noted in the local plan: Charging authorities wishing to introduce the levy should propose a rate which does not put at serious risk the overall development of their area. They will need to draw on the infrastructure planning that underpins the development strategy for their area. Charging authorities will use that evidence to strike an appropriate balance between the desirability of funding infrastructure from the levy and the potential effects of the levy upon the economic viability of development across their area. Please explain the Community Infrastructure Levy (CIL) rate for this site. RISK OF FLOODING The sanity of this plan must be called into question when building nearly 2000 houses and a business park on greenbelt land above Brighouse which currently is covered by fields, hedges and trees acting as a natural flood defence. The severe flooding of Brighouse in recent years should be taken as a warning of our willingness to take risks building on unsuitable land including flood plains. What plans do the Council have in place to ensure that flooding does not occur?

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

Duty to Co-operate Reason:

In terms of the council's duty to cooperate I submit the following views: The council have made it very difficult for residents to make representations. The system of how residents must respond to consultation

of the document it appears to have been made purposely complex, labour intensive and near impossible for those who are not computer literate. Furthermore, deadlines on each occasion have included the school summer holidays making the timescale shorter and more pressurised for working families. Also, the councils attempt to divide the Clifton forum by removing the Thornhills residents from those in Clifton (Clifton residents firmly include Thornhills in the boundary of Clifton) why would the council wish to divide the area accept to suit themselves and divide the united residents!

Suggested Modifications:

Additional Evidence Link:

Comment ID **Lpp693**

Site ref (if applicable): **LP1463**

Person ID: **1135958**

Name: **Ms Christine 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:

The bulk of new houses are proposed to be built in Brighouse, an area already struggling to cope with the amount of cars on the road. No consideration has been given to the fact the major routes through the town grind to a halt during rush hour which can be compounded by any issues on the motorway. This will put further pressure on the local transport network and significantly add to journey times. This is not to mention the additional residents who will require education, health care and local amenities. This will add further strain to these essential services. The plan also losses a vast amount of green land which is crucial to the environment that we are living in and raising our children in. It will create a blot on the landscape and detract from the scenery and walking / cycling routes.

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

Duty to Co-operate Reason:

I believe further studies are required to establish the full impact on the town of Brighouse as this has been disproportionately impacted in comparison to neighbouring areas.

Suggested Modifications:

I would like to see a fairer distribution of the new housing so that the strain is evenly balanced across Calderdale.

Additional Evidence Link:

Comment ID **Lpp696**

Site ref (if applicable): **LP1463**

Person ID: **1130178**

Name: **Mr Adrian Smith**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

There has been complete failure by the council to engage with the local population. Information has been extremely difficult to obtain. Exposure in local media has been small. The website is inadequate and non intuitive. Persons who are computer literate struggle to access the required information in a format that is comprehensible. The extent of the information available once accessed however is overwhelming. There is no easy way to interpret the information provided. Those without the requisite computer skills have no chance of accessing the provided information. Consultation for such radical plans should be publicised much more widely with information provided in an accessible way using language that is approved by the Plain English Campaign. While in this country there are no mandatory guidelines for this, international standards suggest this is a reading age of roughly 10 years The report states that inadequate environmental investigation has occurred

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

Sound Reason:

The development of this area is completely disproportionate to that proposed for the rest of Calderdale. There are areas within Calderdale that are being unfairly denied investment and development opportunities by focusing it all in one place. The ecological and environmental impact of this proposal has been inadequately considered. The impact on the drainage into Wellhome park, brighthouse's main public park has not been properly reflected. Increased run off following development will negatively impact all users as it will increase surface water. The park is already often waterlogged reducing the ability of individuals and families to fully utilise this space. The park is home to both an adult and children's Parkrun. These will be cancelled due to water logging. Parkrun is an important component in the governments policy to tackle increasing obesity in the adult and child population. Local wildlife will be decimated. Deer, bats and other wildlife will have their habitats removed. The impact on health has been inadequately assessed. There is strong scientific evidence linking air pollution (from traffic) to increased childhood and adult respiratory diseases including asthma. There is evidence of increased risk of death in higher air pollution locations. Recent evidence has also linked air pollution to an increased risk of dementia. The clustering of such a large development in a small local area will have a significant negative impact on the quality of air pollution in the local both in the local area and also in the greater Brighthouse area due to the increased volume of traffic. This traffic will in a edition to its health consequences have significant implications for the traffic flow locally and in the greater Brighthouse area. The proposed link road to Bailiff bridge will not alter the increase in traffic into Brighthouse itself The implications for local services have not been adequately appreciated Such a significant development will overwhelm the local services. While I note the proposed development includes new doctors surgeries, I feel that the difficulties in the actual provision of such services to any meaningful standard have not been appreciated. GP recruitment even to well established high quality practices throughout the region is extremely challenging. This is a national problem. There will be no specific incentives that will attract appropriately skilled people to the area as there is a lack of them nationally. The swill increase the burden on our local hospitals that are themselves subject to redevelopment currently with planned reduction in inpatient beds across the Trust. There is a significant mining history in the region The local area/environment will be completely destroyed by the scale of the development.

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

Duty to Co-operate Reason:

Suggested Modifications:

Wider discussion and more accessible information on the details of the plan Full environmental assessment
Full assessment of the new infrastructure demands

Additional Evidence Link:

Comment ID **Lpp697**

Site ref (if applicable): **LP1463**

Person ID: **1121530**

Name: **Mr Robert Cook**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

There has been little regard to inform residents of Calderdale about the disproportionate scale of the housing development proposed in the Brighouse area. It is also questionable as to why the council have altered the boundaries of Clifton so that the entire development now falls entirely within the Thornhills area. This ensures that there is only a very small number of houses to voice their concerns.

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

Sound Reason:

Flooding - Climate change has seen significant increases in sudden levels of rainfall and this has led to Brighouse flooding on numerous occasions. Should the proposed development take place then Brighouse will flood more frequently due to decreased land to soak away rainfall. Furthermore, Thornbeck at Jay House is closed several times of the due to the rain and this would only increase when more properties are built. Infra-Structure - Currently local services are overstretched and struggling to cope with the demand of the community. Doctors, dentists and schools are already struggling to meet the current demand. Roads are already congested on all the main routes in and out of Brighouse, this would only be compounded with another 2000 houses. Air-Pollution - Congestion at peak times increases the level pollution in the air, which is of concern for public health. Many people already have breathing difficulties and should there be an increase in the level of pollution then more will be effected. Open-spaces - Thornhills Lane, Jay house Lane and Thornbeck Lane are all areas of natural beauty where people frequently visit to walk, run and cycle. It is also an area where there is a significant amount of wildlife in headrows and woodlands. These would disappear when the area becomes a suburb.

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

Duty to Co-operate Reason:

I believe that the council has failed to cooperate with neighbouring authorities that are building houses on the borders of Brighouse (Kirklees and Bradford) should this development take place it will not only be the additional 6000 houses that are built for Calderdale but 1000s more when take into account the development in surrounding areas.

Suggested Modifications:

Review the infra structure of roads surrounding Brighouse both at Peak and off Peak times. Use brown field

sites for development Review all Green belt areas to built on across Calderdale to ensure proportionate distribution.

Additional Evidence Link:

Comment ID **Lpp710**

Site ref (if applicable): **LP1463**

Person ID: **1183588**

Name: **Mrs Diane Sykes**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The plan includes land which belongs to my family. We have not been consulted about offering it into the plan, surely the council should have investigated this, it gives a false indication of the land available in Clifton, how many other errors are there? It has all seemed so disorganised from start to finish, there are so many holes in the plan that I am worried and have no faith in the plan, which may just be a job to someone but it's mine and my children's lives and we have a right for this plan to take into consideration our quality of life and well-being.

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

Sound Reason:

Of course development is necessary but so is being sensible about how much growth the surrounding areas can cope with, as some as an accident occurs in the m62 it's gridlocked into Brighouse. I can't see any sensible regard to infrastructure on the plan.

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

Duty to Co-operate Reason:

The plan has not cooperated with the locals because you would have taken into consideration how the scale of the plan in Clifton is going impact on the wellbeing and standards of living of the locals. The environmental pollution it is going to cause will increase an area already identified as having high levels of toxins, not to mention removing invaluable recreational land for ramblers, dog walkers. We are aware there needs to be development but at this scale it's unrealistic and very sad!

Suggested Modifications:

Someone with experience and considering the wellbeing of the local people should take over the plan.

Additional Evidence Link:

Comment ID **Lpp72**

Site ref (if applicable): **LP1463**

Person ID: **817527**

Name: **Miss Nicola Denford**

Organisation:

Agent ID:

Name:

Organisation:

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 refer in particular to proposed LP Site Reference LP1463. This proposed 'garden suburb' is situated in an area of existing green belt, which in itself should be reason enough not to develop the land. In addition to this, the Council spent months (and thousands of pounds of tax-payers' money) devising the methodology for a green belt review, and then further months reviewing all the green belt areas in Calderdale. In respect of the green belt review concerning the land at Clifton, the outcome for much of the land was 'Most Sensitive Green Belt Parcel'. One would therefore question, what was the point of carrying out the extensive reviews, if land classed as 'Most Sensitive', is then going to be put forward for development "" in the case of LP1463, the largest proposed development in the whole of Calderdale? The Council's comments on this site were: 'The site performs an important role in safeguarding the countryside from encroachment'. My comments above are not reserved purely for LP1463, but relate to the blatant disregard in the Calderdale Local Plan for the fundamental aim of Green Belt Policy - namely, to prevent urban sprawl. Calderdale Spatial Planning should be looking to develop brownfield sites and to regenerating disused sites, before they take the "easy option" (and the option which is preferable to developers) of wiping out our areas of green belt. Developers do not care about green belt, nor do they care about the opinions of local communities! At what point did hitting target figures for new housing become more important than retaining high-performing green belt?

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

Duty to Co-operate Reason:

I will be covering this in my comments for individual sites.

Suggested Modifications:

Additional Evidence Link:

Comment ID **Lpp73**

Site ref (if applicable): **LP1463**

Person ID: **1181936**

Name: **ms Annabel Jessop**

Organisation:

Agent ID:

Name:

Organisation:

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 very concerned about the housing allocation in the whole of the Brighouse /Rastrick area, but in particular that in the Clifton / Thornhills area. This is deemed to be sensitive green belt so why are we down to see a substantial loss of this greenbelt ? If the aim of Green belt is to prevent urban sprawl this will only

add to it. I dont understand how the loss of Greenbelt will improve air quality. A housing development of this scale will add approx 400 extra cars to the already overcrowded roads and add to air poluution. We are all told to live healthier lives to get out more and do some brisk walking . However , the residents of Brighthouse will only be left with the option walking in Wellholme Park as all other current options will be built on. The scale of building in Brighthouse is completely disproportionate and unfair to the residents of Brighthouse. There is also the impact on wildlife and in particuar the tree sparrtow which is to be found in Thornhill.

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

Site ref (if applicable): **LP1463**

Person ID: **1181906**

Name: **Mr Timothy Davis**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

There are a number of aspects of the way in which the Council has approached its obligation to engage the community in the proposals for this site that I find deeply troubling, as follows : Firstly, this Publication Draft of the Plan was made available to the public for comments from 10th August 2018 to 24th September 2018. The Council has been able to devote large amounts of time to getting the Plan to this stage and in that context allowing the public only six weeks over a period when it is known that many people will be away on holiday is an action that could be regarded as a cynical manner of engaging the public. (It is notable that earlier versions of the Plan have been subject to similar timescales and timing for their respective consultation periods.) Secondly, the Council's actions in excluding residents of Thornhills from a residents' forum organised from immediately adjacent Clifton in order for that forum to be recognised by the Council could be viewed as a deliberate attempt by the Council to frustrate engagement by the public rather than encourage it particularly as this proposed development site is likely to have more impact on those resident in Thornhills than elsewhere. Lastly, there seems to me to be no evidence to suggest that the Council has taken into account any of the comments made by members of the public at earlier stages of the Plan concerning this site in any substantive way. I gather that there were in excess of 9,000 comments made during the development of the entire Plan and many of these were made in relation to this site. For the Council to make little or no change to its final proposal in reaction to such a large number of well-founded observations is simply not credible and gives the impression of a Council seeking to force through its own plans without proper regard for the views of local residents. Taking the above observations together, my view is that the Council has not met its duty to engage with residents and other local organisations in any meaningful way that would indicate the Plan has been developed as a result of a democratic two-way process between the governed and those in authority.

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

Sound Reason:

This proposal covers a very large area and would result in the construction of almost 2,000 houses which far exceeds the size of the existing communities in Thornhills and the immediately adjacent Clifton village. Such a large increase in housing in one area should only ever be undertaken after ensuring that all possible other alternatives have been exhausted and even then not without great care to ensure that all requirements for massively improved infrastructure of all types have been definitively laid out and shown to be deliverable before the first new houses are built. The Council has in my view failed to demonstrate any definite plans for such improvements with the very high risk that should the development go ahead there will be numerous serious detrimental outcomes under a range of headings as follows :

Air quality - paragraph 13.4 of the Plan acknowledges that large parts of Brighouse are Air Quality Management Areas (AQMAs) meaning that they already exceed nationally agreed levels of pollutants. AQMAs carry with them a requirement from national government for Local Authorities to develop plans to reduce levels of pollutants and so it would appear that LP1463 bringing, as it would, several thousand more vehicles to the area, is in direct contravention of this requirement. This is particularly so in light of plans for other sites within the Council's Plan such as LP1451 and the fact that the Council has not included in the Plan any definitive measures to improve air quality from its existing poor levels. The Council's references to air quality actions such as making live data available and the 'exploration' of novel and emerging technologies appear vague in the face of serious threats to air quality and hence human health. **Traffic congestion and road safety** - the construction of almost 2,000 houses could mean an extra 4,000 cars will be brought to the area. A large number of those are likely to be used for commuting daily on the M62 and the Council's Plan gives no consideration whatsoever to the vast increase in the number of vehicles that would be seeking access to the M62 at Junction 25 via roads through Clifton such as Towngate or New Street all seeking ultimately to travel via Coalpit Lane to the M62. The top part of Coalpit Lane currently has space for only one vehicle width so is wholly unfit for purpose as a conduit onwards to the M62. The implications for traffic congestion and road safety in Clifton and particularly for children attending St John's Primary Academy on Towngate are self evident and yet the Council has failed to address these in the Plan. **Flood risks** - the Plan at paragraph 2.5 acknowledges the risks faced by towns in Calderdale to flooding from the River Calder. Brighouse town centre has been one of the towns to suffer serious flooding in recent times and so with that in mind it would seem highly risky to create such an increase in built-on land at sites such as LP 1463 which are at a level above Brighouse town centre. The run-off from a built-on site as large as that proposed here would be significant and in my view pose increased flood risk for Brighouse town centre and surrounding areas. **Loss of Green Belt** - the development of this site will result in loss of a very large section of the Green Belt. The National Planning Policy Framework states that "the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open and that the essential characteristics of Green Belts are their openness and permanence." If development of this site goes ahead as planned then while some Green Belt will remain between it and Scholes and Cleckheaton (in the neighbouring Kirklees Local Authority area) that remaining buffer will have become very small indeed. It surely cannot be enough to be able to show merely that there is some open land between urban areas, no matter how small, but rather the Council should be required to adhere to the spirit of Green Belt policy namely to ensure there is significant openness between towns on a permanent basis. Moreover, that part of the Green Belt that currently provides a buffer between Clifton and Brighouse will have been completely lost, a loss which in my view is not justified by the Council's need to meet housing targets which could be met by other means even if those other means are more difficult and time-consuming to achieve. In the case of this site, if developed as planned, the remaining open land will in my view represent tokenism in the context of Green Belt policy. **Lack of proportionality** - A recent survey published on the BBC website demonstrated that the area of land currently built upon in Calderdale at 11% is almost double the national average of 6%. Moreover the survey also demonstrated that the bulk of Calderdale's built on land is in the eastern part of the Borough. What this suggests is potentially two considerations, firstly should there be any further building in Calderdale at all ? And secondly, if there is to be further building, should that new building be in the part of the Borough that is already over-developed ? What these considerations seem to

demonstrate is that the Council's plan for this site represent an aspect of Council policy that is particularly unsound - i.e. the disproportionate development of the eastern end of Calderdale. Here is the link to the report : <https://www.bbc.co.uk/news/uk-41901294> In summary, my view is that the Council's Plan for this site has not been positively prepared because it has given wholly inadequate consideration to infrastructure requirements with serious ensuing risks to health and safety and would result in disproportionate development of the eastern part of the Borough. As a result, my further view is that the significant loss of Green Belt that would ensue is not justified and my suggestion to take account of these concerns is that the Council should be required to develop alternative plans to find an additional 2000 homes including greater use of brownfield sites and currently unoccupied housing.

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

Duty to Co-operate Reason:

It is not at all clear to me that the legal requirement for the Council to cooperate with other local planning authorities and other bodies has been met in relation to this site in anything other than a superficial manner. For example, if development of this site goes ahead as planned then there will inevitably be a significant increase in the number of carjourneys into the Kirklees Local Authority area and yet there are no definitive proposals by the Council for accommodating such increases either in the M62 Junction 25/ Cooper Bridge area or the junction of Walton Lane and the A649. Paragraph 13.18 of the Plan does make reference to the Infrastructure Delivery Plan (IDP) but the latest published version of the IDP seems to have been in 2012 and so it would in my view be risky to assume that the IDP is fit for purpose in 2018. Moreover the 2012 IDP and the 2017 draft of the next version do not appear to provide comfort that the infrastructure improvements required as a result of the Plan are comprehensive and definite in their delivery. The Plan contains proposals for very large developments to take place alongside similarly large developments in the neighbouring authority of Kirklees and residents in both areas have a right to expect that their Local Authorities will co-operate fully to develop infrastructure plans that are deliverable with certainty ahead of these developments taking place.

Suggested Modifications:

There should be a full review of the comments made during the section 18 process and the Council should be required to modify the plan for this site after carrying out further work to identify alternative sources of housing such as brownfield sites and unoccupied housing. In addition the Plan should be modified to provide definitive plans for infrastructure development including but not limited to local and national roads in the area.

Additional Evidence Link:

Comment ID **Lpp865**

Site ref (if applicable): **LP1463**

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:

The traffic assessment for this site needs to include an interrogation of Calderdale's strategic transport model examining traffic volumes ('actual flow - total') as well as V/C ratios. 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. 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: - The Highways England Network Analysis Tool (NAT) indicates that the traffic generated and attracted by this site will have a significant traffic impact on the strategic road network (SRN) at M62 junctions 24 and 25. The site has a major adverse impact on the operation of the SRN with NAT output showing a maximum peak hour link flow on the M62 of 428 vehicles generated by the site. - recent modelling undertaken as part of the Highways England West Yorkshire Infrastructure Study indicates that capacity improvement measures additional to the schemes included in the RIS will be needed on the SRN to cater for demand generated by development in Calderdale and neighbouring Districts during the period to 2030. "¡ West Yorkshire Infrastructure Study model outputs show that additional capacity enhancement measures will be needed at junctions 24 and 25 Local highways issues: - Area wide traffic impact at several junctions which would almost certainly need mitigation. Site of this size would need several access points. Approx. 2000-2500 vehicle departures from site during morning peak if fully developed "¡ Summary of highways and access issues: - It is likely to have significant traffic impact flows in central Brighouse and on the strategic road network when fully developed. See the attached screenshot from the Calderdale strategic transport model.

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/5074084>

Comment ID **Lpp894**

Site ref (if applicable): **LP1463**

Person ID: **1130346**

Name: **Mr M Chalker**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Recent consultation has been excessively brief, documentation wordy and difficult to understand "" particularly there is no mechanism to see changes from previous revisions. Core Strategy documentation relates to consultation from 10 years ago in 2008/9! In Brighouse only 17 people attended a workshop "" how can this be a current indication of people's views on the Local Plan when there are 3000 houses and an industrial park being proposed! The Plan Map is SIGNIFICANTLY MISLEADING when referring to sites LP1451/LP1463 - These show as 'REJECTED' and ARE NOT INCLUDED in 'New Housing'. This WILL DECEIVE people into believing no change is planned - Despite the fact the proposal is for OVER 3000 new houses in these two locations! They will not look for 'Garden Suburbs' which is meaningless to the public. The Sustainability Report contains arbitrary targets, and provides no evidence of need (Strategic Housing Assessment) within the Brighouse area. There are areas with missing targets and no indication that targets are meaningful and have been met before.

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

Sound Reason:

The scale of development proposed around the Brighthouse area is not Sustainable and isn't justified within the plan. I can see no evidence (I'm unable to find any Strategic Housing Market Assessment Report) that indicates there is a sufficient need within the Brighthouse area for such significant development. The Housing Stock Report included has no detail other than to show how many houses were sold in 2017! The Sustainability Appraisal has arbitrary targets listed "" such as reducing traffic impact on the environment by increasing Rail Journeys by 50%, 25% increase in bus journeys. Has the Council got a proven track record in meeting such - How did the Council SCORE against their UDP 2006 Section 9.3 Transport/Air Quality TARGETS? Reducing pollution, raising train travel 40%, limiting traffic growth and congestion etc. The Sustainability appraisal also has 'to be developed' against the 'Efficient Use Of Land' section. Similarly providing good employment for all "" is awaiting targets. How can the plan be regarded as sustainable if this hasn't already been measured objectively!

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

Duty to Co-operate Reason:

The provided Statement indicates discussions with neighbouring authorities have taken place, but fails to show any meaningful, proven and costed mitigations. Particularly in relation to transport, greenbelt and air quality. Remarkably the housing stock report shows less detail for Brighthouse than other areas, yet it is to take the vast majority of new housing and commercial building within the plan! The CMBC Local Plan Working Party appears BIASED - NOT ONE of the 7 Members is from the Brighthouse/Rastrick Wards - which are the most affected by the plan!

Suggested Modifications:

Additional Evidence Link:

Comment ID **Lpp904**

Site ref (if applicable): **LP1463**

Person ID: **1130340**

Name: **Mr P Chalker**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Recent consultation has been excessively brief, documentation wordy and difficult to understand "" particularly there is no mechanism to see changes from previous revisions. Core Strategy documentation relates to consultation from 10 years ago in 2008/9! In Brighthouse only 17 people attended a workshop "" how can this be a current indication of people's views on the Local Plan when there are 3000 houses and an industrial park being proposed! The Plan Map is SIGNIFICANTLY MISLEADING when referring to sites LP1451/LP1463 - These show as 'REJECTED' and ARE NOT INCLUDED in 'New Housing'. This WILL DECEIVE people into believing no change is planned - Despite the fact the proposal is for OVER 3000 new houses in these two locations! They will not look for 'Garden Suburbs' which is meaningless to the public. The Sustainability Report contains arbitrary targets, and provides no evidence of need (Strategic Housing Assessment) within the Brighthouse area. There are areas with missing targets and no indication that targets

are meaningful and have been met before.

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

Sound Reason:

The scale of development proposed around the Brighthouse area is not Sustainable and isn't justified within the plan. I can see no evidence (I'm unable to find any Strategic Housing Market Assessment Report) that indicates there is a sufficient need within the Brighthouse area for such significant development. The Housing Stock Report included has no detail other than to show how many houses were sold in 2017! The Sustainability Appraisal has arbitrary targets listed "" such as reducing traffic impact on the environment by increasing Rail Journeys by 50%, 25% increase in bus journeys. Has the Council got a proven track record in meeting such - How did the Council SCORE against their UDP 2006 Section 9.3 Transport/Air Quality TARGETS? Reducing pollution, raising train travel 40%, limiting traffic growth and congestion etc. The Sustainability appraisal also has 'to be developed' against the 'Efficient Use Of Land' section. Similarly providing good employment for all "" is awaiting targets. How can the plan be regarded as sustainable if this hasn't already been measured objectively! All remaining greenbelt around Brighthouse will be removed in this plan.

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

Duty to Co-operate Reason:

The provided Statement indicates discussions with neighbouring authorities have taken place, but fails to show any meaningful, proven and costed mitigations. Particularly in relation to transport, greenbelt and air quality. Remarkably the housing stock report shows less detail for Brighthouse than other areas, yet it is to take the vast majority of new housing and commercial building within the plan! The CMBC Local Plan Working Party appears BIASED - NOT ONE of the 7 Members is from the Brighthouse/Rastrick Wards - which are the most affected by the plan!

Suggested Modifications:

Additional Evidence Link:

Comment ID **Lpp927**

Site ref (if applicable): **LP1463**

Person ID: **1044766**

Name: **Mrs Danielle Hirst**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The Sustainability Appraisal Report for the proposed site is not included in this version of the proposed plan and was conveniently hidden away in the previous draft plan, meaning that many respondents were not even aware of its existence. I am a computer literate, professional person, who is used to using the internet for research purposes and yet I only came across the Sustainability Appraisal Report for the site by chance. Surely, the Sustainability Appraisal Report should sit alongside the Site Assessment Report, so that the two can be reviewed objectively together & an appropriate response formed. For this garden suburb site and other development sites in the plan, the Site Assessment Report is relatively easy to find on the Policies Map; however, the Sustainability Appraisal Report is not & so the public have not been given an

adequate opportunity to critique it. The Council's Consultation Statement massively overemphasises the amount of community involvement that has taken place on the Local Plan and I think if you were to poll the residents of Calderdale, the overwhelming response would be that the community has been kept in the dark over the proposed plans. The council has seriously overemphasised its attempts at press releases & social media updates! Publicity about the Local Plan has mainly come from neighbourhood forums and our local MP. It has also been extremely difficult to navigate the council's website and find the supporting information, and that is for a computer literate person. Elderly people and other groups within the community have even less chance of gaining access to such information.

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

Sound Reason:

Two garden suburbs within such close proximity to each other is ridiculous and should not be imposed on the town of Brighouse. The plan does not comply with numerous NPPF policies and I have detailed these in my previous response to the council. For completeness, I have included them again below: Flooding One of the National Planning Policy Framework's 12 core principles is set out as follows: "Support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources" More specifically in terms of flooding, it also states that: "When determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere" The proposed development at High Moor Lane, clearly does not take into consideration the increased flood risk caused by building large housing developments on green belt land within the Calder Basin. Brighouse suffered terribly in the Boxing Day floods of 2015 and it is simply common sense that more development will in turn create more surface run off, less infiltration & attenuation of rain water and therefore increased river levels & flooding. Whilst flood risk assessments will no doubt be required and 'mitigation' measures recommended, nothing can substitute the value of retaining our open spaces as part of the flood risk strategy. Highways THE TRAFFIC PROBLEM IN BRIGHOUSE IS UNDENIABLE.....unless you are either a recluse who never leaves the house or someone who commutes by helicopter. The whole town is virtually stationary at rush hour & is gridlocked whenever an accident occurs on M62 or surrounding major roadways. I am told that traffic assessments have been carried out and no real concerns were raised - I would strongly question the validity of this conclusion and ask that more 'independent' surveys are carried out. The addition of another 1257 dwellings, along with the other 'Garden Suburb' at Woodhouse Lane & the other smaller developments proposed for Brighouse is extremely alarming in terms of the impact on Highways. Around 6000 new dwellings in Brighouse will lead to a massive increase in the number of cars / road users associated with such development, which will push an already overstretched highway system to breaking point. Paragraph 31 of the National Planning Policy Framework states that: "Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development, including large scale facilities such as rail freight interchanges, roadside facilities for motorists or transport investment necessary to support strategies for the growth of ports, airports or other major generators of travel demand in their areas." I have seen no information in the Local Plan which addresses the issue of highways / road infrastructure or the travel demands of the Brighouse area. I am extremely concerned that should this development go ahead, the impact on highways will be detrimental to the whole of Brighouse, it's residents & road users. In turn, this will negatively impact local businesses, damaging the local economy. Adequate infrastructure needs to be considered, consulted on & properly planned, PRIOR to this development taking place. Ecology One of the National Planning Policy Framework's core principles states that Local Plans should: "Contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework" More specifically, it also states that: "The planning system should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, geological

conservation interests and soils; recognising the wider benefits of ecosystem services; minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate" The site is an essential habitat to various birds, mammals and amphibians & the development of the site will lead to an irreversible destruction of these vitally important wildlife habitats. Contrary to the core principle stated above - the development will not 'conserve or enhance' the natural environment and will in fact be a detriment to the local environment, reducing the biodiversity of the local area.

Minerals Site This particular site is designated as a proposed 'Coal Mineral Safeguarding Area', as set out in the Local Plan. The National Planning Policy Framework states that the council should: "define Minerals Safeguarding Areas and adopt appropriate policies in order that known locations of specific minerals resources of local and national importance are not needlessly sterilised by non-mineral development, whilst not creating a presumption that resources defined will be worked; and define Minerals Consultation Areas based on these Minerals Safeguarding Areas" Clearly more thought needs to be given to this designation. In addition to this, the site has been extensively mined for coal during in the late 1800's and early 1900's and I would be interested to know what (if any!) consideration / investigation has been given to potential ground instability from shallow coal workings beneath the site.

Green Belt THIS SITE IS ALREADY DESIGNATED AS GREENBELT LAND & SCORES WELL IN THE GREENBELT ASSESSMENT The National Planning Policy Framework document states that: The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. Green Belt serves five purposes: 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; to preserve the setting and special character of historic towns; and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Should this development (along with the garden suburb at Woodhouse Lane) go ahead our precious and dwindling greenbelt land surrounding the Brighouse area will be IRREVERSIBLY damaged. It does appear that the planners have glanced at the maps of Brighouse, identified some large green, open space areas (regardless of their greenbelt status) and considered them as suitable sites, without considering their importance in relation to the points listed above. Along with the similar large housing & commercial developments proposed by Kirklees council, it is clear that our green belt is massively under threat and we should do everything we can to preserve it. Green belt serves to provide areas of recreation for people of all ages and abilities including walkers, runners, cyclists & others wanting to enjoy the countryside in their local area. It is a vitally important leisure / recreation resource, which should not be underestimated & serves to enhance peoples' health and well being. Not to mention it is home to a huge range of plants & animals, which add to the richness of our local environment. Finally, as stated in the list above, our greenbelt serves to check unrestricted sprawl of urban areas & prevent neighbouring towns merging into one another. Increasing the size of Clifton by more than double does not fall in line with this principle.

Deliverability The National Planning Policy Framework document makes two key statements: "Local Plans should be aspirational but realistic" "Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential" Clearly the Local Development Plan & in particular this proposed development at Highmoor Lane is aspirational, but based on the points raised above, it is not realistic & therefore not deliverable. In addition, 'early and meaningful engagement' has not occurred. In fact, it has all been kept very low key and 'under the radar' with very little information being provided to the residents of Brighouse from the council. I was only made aware of this plan by a mail drop from a local councillor who was opposing the developments - prior to that I would have been non the wiser & I know I am one of many, many people who feel this way. As such, I do not feel this development is deliverable, because the 'consultation' process has been absolutely diabolical. We have given an extremely

short period of time to respond to the plan, and it was published at a time when many people will have been busy with children in the summer holidays or away on holiday themselves & unable to attend local meetings, participate fully with the local forums etc. The council should be held to account over the way in which the whole 'consultation' process has been handled. Additional comments I would urge the council to LISTEN to the views of the local residents of Brighouse, as they are the people who understand the town more than any external assessors & consultants. Our town will be negatively, and in many respects irreversibly impacted by this proposed 'Garden Suburb' at Highmoor Lane. I have not proposed any alternative use for this site below, because it already brings so many benefits to the local town in its current state & as such, this should be preserved at all costs.

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

Duty to Co-operate Reason:

I am very sceptical about the actual level of co-operation between Calderdale Council and the neighbouring Local Authorities of Kirklees and Bradford. The Duty to Co-Operate Statement produced by Calderdale Council has some vague outcomes of meetings between the authorities which include the following: 'SE Calderdale /N Huddersfield Delivery Plan Scoping Report/Cross boundary working "" DISCUSSIONS ONGOING' 'Cross boundary planning issues - DISCUSSIONS ONGOING' Other outcomes of meetings between the authorities include the following: 'Both authorities to continue monitoring issues discussed and pursue statement of common ground' 'Both authorities to continue monitoring issues discussed to determine if any joint working required' In my opinion, continued monitoring and 'discussions ongoing' is simply not acceptable evidence of the Council's compliance with their 'Duty to Co-Operate'. The proposed plans for Brighouse will change the shape of Brighouse forever and so Calderdale Council must have a coherent local plan, that has been fully appraised and co-ordinated with its neighbouring Local Authorities and their development plans. A perfect example of where this has not happened is the massive housing development proposed at Bradley Golf Course, which is adjacent to the garden suburb at Woodhouse and so will have a huge impact on traffic, pollution, greenbelt etc and it appears this has been overlooked.

Suggested Modifications:

The site should remain as a greenbelt site and the benefits of this land use given more credit & value. Brownfield sites should be better explored - of which there are many across Calderdale.

Additional Evidence Link:

Comment ID **Lpp944**

Site ref (if applicable): **LP1463**

Person ID: **1129090**

Name: **Mr Richard Kershaw**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The quality, accuracy and incompleteness of the Plan and the supporting evidence mean the Local Plan cannot possibly be considered to be compliant. With regard to the consultation process itself, communication has been wholly inadequate with many residents only becoming aware of the Local Plan consultation by word of mouth and via social media. There has been absolutely no official communication from Calderdale Council whatsoever. Additionally, access to the Local Plan and supporting documentation

has mainly been via the Calderdale website which is far from easy to navigate. Initially a number of drop-in sessions were set up to provide information and support. Presumably the initial lack of a drop-in session in Brighouse was a deliberate attempt to keep those most affected by the plan in the dark.

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

Sound Reason:

The plan greatly concentrates proposed housing and industrial development around Brighouse and Clifton at the expense of other areas covered by the plan. In fact evidence shows there is a greater need for both types of development in other parts of Calderdale. Neither the plan nor the supporting evidence justify the need for such substantial housing or industrial developments. Many of the reports provided as evidence are either incomplete or out-of-date. Firstly, how can such a critical strategic plan be based on such reports and secondly, how can residents be expected to provide a rational and considered response when presented with such poor quality information. The plan is ill-conceived, disproportionate and grossly unfair. The two sites of particular interest will be referred to as follows: Wakefield Road / Clifton Common (LP site ref: LP1232), referred to Clifton Common Highmoor Lane and Bradford Road, Brighouse (LP site ref. LP1463), referred to as Highmoor Lane My concerns relate to a number of issues, including the impacts on the natural environment, air quality and traffic, along with existing infrastructure and public services around the Brighouse and Clifton areas. Biodiversity Consultation with West Yorkshire Ecology has revealed that the habitats and wildlife around Clifton are currently under recorded. Some areas are already proposed as Wildlife Habitat Network, however, it is felt that some UK BAP Priority Habitats have been overlooked and therefore the extent of the Wildlife Habitat Network of the area should be increased. In conclusion, the impact of the proposed plan on biodiversity is currently unknown. Green Belt The proposed Highmoor Lane 'Garden Village' development requires the release of approximately 141 hectares of Green Belt which is categorised as the 'most sensitive' and 'high-performing'. The release of this land doesn't appear to have been done as part of a wider consideration of Green Belt across West Yorkshire as is required. The loss of such a significant area of green space, much of which is accessible to the public for recreation will have a significant impact on the local community. The development will lead to Clifton being subsumed into the wider Brighouse area and fundamentally spoil the character of the village. Although the Clifton Common site is inexplicably not classified as Green Belt it does in effect perform the same service and would be rated as high-performing, most notably due to its role in providing 'an effective barrier to sprawl from large built up areas'. Wakefield Road / Clifton Common Site (LP1232) Assessment The site assessment outlines a number of areas of concern. The proposed site is larger than Highways England (HE) modelling and therefore significantly underestimates the potential effects of allocating the site. Schemes such as Smart Motorways will not mitigate the effects on increased traffic. Some mitigation schemes are proposed but HE and CMBC still don't understand the implications of the larger development and have yet to identify adequate mitigation. The site is given a RAG status of AMBER and is borderline RED. The report also states that; the site is 'relatively flat near to boundary with Wakefield Road' which is completely incorrect as the site rises steeply from Wakefield Road. 'development of the site is likely to cause highway capacity issues as highlighted by HE' 'negative impact on AQMA (Air Quality Management Area) need to be addressed' - further evidence on air quality will be provided later. The site assessment takes no account of many other factors including the impact on local residents, particularly, those adjacent to the site, who will be severely affected by noise and light pollution. As well as the impact on quality of life, the development of an industrial estate at the boundary of these properties will have a catastrophic impact on property values, way in excess of the impact that a residential development would have. Clearly the evidence categorically does not support the allocation of the site for the proposed Industrial development. Waste With regard to waste management the Waste Evidence Report Update (2016) states that; 'Commercial and Industrial (C&I) arisings aren't recorded' 'projections to be treated with caution' 'forecasts are based on Regional Economic Model employment projections and the waste per employee figures and businesses split by Standard Industry Classifications' This suggests the base data used in the

assessment is questionable and the highly theoretical, modelled conclusions aren't reliable. Estimated future requirements for Local Authority Collected Waste and C&I are reflected in the documents and a large new municipal waste facility is proposed on Wakefield Road at Cooper Bridge (land parcel ref. WLP4). Clearly this doesn't consider the impact on an already congested stretch of road and is in close proximity to Kirklees' proposed precision engineering and advanced manufacturing development. It is probably safe to assume that this plan hasn't been developed in conjunction with Kirklees.

Water and Waste Water The Local Plan refers to Water and Waste Water requirements being covered in the Infrastructure Delivery Plan (IDP), which is from 2012 and is clearly out-of-date. With regard to water, the IDP states that; 'Yorkshire Water has a grid system across Yorkshire therefore water supply is not a blocker'. This takes no account of available treatment works (production) capacity or the supply demand balance. Raw water resources are not infinite and water supplied into distribution has to come from somewhere. Additionally, pumping water across Yorkshire through the grid is expensive both financially and in terms of carbon emissions.

With regard to waste water, the IDP refers to Brighouse Wastewater Treatment Works at Cooper Bridge as having capacity for '10% population growth / 2,000 new dwellings', which is significantly less than the circa 6,000 properties planned for the Brighouse area, the Clifton Common industrial development and certainly not for development further up in the catchment, which stretches between Clifton, Rastrick, Bailiff Bridge, Lower Wyke, Shelf, Shibden, Stump Cross, Northowram and Hartshead Moor Services. There is no mention of sewerage infrastructure requirements in the IDP. There are 2 existing combined (foul and surface water) sewers crossing the M62 in the vicinity of J25 which transfer waste water from the catchment described above and through to the waste water treatment works at Cooper Bridge. The size and depth of this infrastructure under a major motorway junction means the cost of upgrade works to accommodate the required increase in capacity would be likely to run into the 10's of millions of pounds.

Air Quality The impact on air quality of significant additional volumes of traffic in and around Brighouse is a major concern. The council's own website states that Brighouse already exceeds air quality objectives for traffic-related nitrogen dioxide and is an Air Quality Management Area. Additional traffic will only exacerbate this problem. A 2014 Public Health England report 'Estimating local mortality burdens associated with particulate air pollution' estimated that long-term exposure to air pollution caused the death of 93 people in Calderdale in 2010 (2,567 across the whole of Yorkshire). Whilst the council does monitor nitrogen dioxide in Brighouse, this is done via just 4 diffusion tubes, none of which are located in the most congested locations, such as the roundabout at the bottom of Clifton Common. There are, or have been, several more diffusion tubes located around the town but the collection of data from these has been discontinued. Data for particulates, which have been linked to asthma, lung cancer, respiratory diseases, cardiovascular disease, premature delivery, birth defects, low birth weight and premature death, isn't collected at all in the Brighouse area. This perfectly demonstrates the seriousness with which the council treats air quality and the health of its residents and goes against the council's own Joint Wellbeing Strategy 2012-22 (March 2013) which includes 'People have good health' as a priority outcome.

Employment Land Study (NLP) The Employment Land study published in August 2017, part way through the consultation period, is still in draft form and is incomplete and inaccurate. This sums up the haphazard approach the council has taken in the preparation of its Local Plan and the consultation process. The council can't possibly have taken the output of this report into consideration and yet still submits this as part of its 'evidence base' for consideration by residents. The report is incomplete and includes several references to information still being required from CMBC.

With regard to 'Employment Floorspace', the report suggests that Brighouse is as equally well catered for as Elland and Halifax, and much better catered for than other areas in Calderdale. Perhaps these areas would benefit from economic investment and new employment opportunities. The report states that job density in Calderdale is 'high', 'higher than for Yorkshire, Humber and Great Britain and all other nearby areas except Wakefield'. This is incorrect. Table 3.2 in the report clearly shows that Calderdale has a higher job density than Wakefield. The table shows that in fact only Leeds has a higher density. The report also states that 'until recently, CMBC collated data on development of employment land for Annual Reporting purposes' and shows that no data on the loss of employment land has been reported since 2013/14. The report concludes that it is 'important that CMBC monitors and

responds to key drivers and macro trends that influence requirements for employment space including, self-employment, homeworking and increasing use of technology'. Calderdale doesn't monitor the development of land for employment or on the loss of employment land, let alone 'drivers and macro trends'. The report talks about the shared boundary with Kirklees and their proposed development at Cooper Bridge which will require the use of J25 of the M62. The report makes no reference to the impact on Wakefield Road either side of J25 between Brighouse and Cooper Bridge a section of road which is extremely congested even now. The Stakeholder Consultation referred to in the report makes reference to local businesses and others, but there is no mention of local residents. The report talks about the methodology for assessing 'Future Employment Land Requirements' and states that 'the 'Housing and Economic Development Needs Assessment' advises that Authorities should develop and have an idea of future needs based on a range of data which is correct and robust'. CMBC doesn't collect data on the development of land for employment or the loss of employment land so can't possibly understand current or future needs. The report states that 'Commercial agents have pointed out that streamlined 'office-to-residential' conversion is an issue and that a considerable amount of employment land stock is no longer fit for purpose'. If office space is being released for conversion to houses there obviously isn't a need for additional office space. Investment should be focussed on regenerating that employment land that is deemed to be unfit for purpose, rather than destroying greenfield sites. The report states that in Halifax 'large allocated sites haven't come forward and many existing sites are average to poor quality buildings'. These existing allocated sites should be brought forward and existing sites should be regenerated rather than destroying greenfield sites. The report states that West Calderdale has 'more poor quality sites than other areas of Calderdale'. Clearly existing stock is available and is in need of investment. The report concludes that CMBC should reflect best practice guidance and 'it will be important to monitor future changes in the demand and supply of employment space. CMBC monitors planning permissions granted for B-class employment... but no longer records them for Annual Reporting Reports... [it is] strongly recommended a mechanism be put in place to monitor applications so pipeline of supply can be assessed'. The evidence suggests that CMBC has no idea if there is a need for the Class B development which is proposed across the plan area and particularly on the Clifton Common site. Traffic With reference to the 'Traffic Survey: CALDERDALE LOCAL PLAN, EVIDENCE BASE - TECHNICAL NOTE 2: IMPLICATIONS OF SETTLEMENT GROWTH' produced by WSP in July 2016. With regard to the proposed residential development, the report states 17,651 properties are required and are included in the Local Plan and yet the traffic survey is based on just 11,900 properties. The Local Plan includes around 19,000 properties and therefore any conclusions drawn by WSP will significantly underestimate the impact on traffic and congestion. The report is based on 4,500 properties around Brighouse. The Local Plan includes 5,500 properties in the Brighouse area and therefore again any conclusions will significantly underestimate the impact of these numbers. This also fails to consider nearby developments in Kirklees, such as Bradley Park. The report states that the 4,500 units in Brighouse will create 3,100 new journeys in the morning peak period. This is an additional trip rate of 0.69 per property seems very low and suggests a further underestimate of the impact on traffic. The report states that '57% of new trips will be made by car and 40% will be made by active modes (walking or cycling)'. The terrain around Brighouse, particularly up towards Clifton, along with the complete lack of suitable infrastructure between Brighouse and Clifton mean cycling, and to some extent walking, is completely impractical for most people – I say this as a cyclist. This suggests that the use of cars is likely to be much higher than estimated. The report states that 'many new trips will be via Brighouse town centre which is already congested at peak times'. The report states that 'trips on A641 from Brighouse to Huddersfield likely to cause increased congestion'. The report states that 'new trips from Brighouse to Halifax via Hipperholme and Stump Cross..... due to the nature and level of congestion at these locations.... additional traffic would require currently unplanned investment'. It is perfectly clear from the report that existing traffic infrastructure is already stressed and cannot possibly cope with the density of residential development proposed for the Brighouse area. With regard to the industrial development on the Clifton Common site, the assessment is based on 32 hectares yet the Local Plan allows for 36.88 hectares therefore any conclusions will underestimate the impact of the

development of traffic and congestion. The development on the Clifton Common site is split between classes B1, B2 and B8. The report assumes a very low proportion of B1 which is reported to have the highest trip rate per m2. Again, this suggests the report may underestimate trip rates and therefore traffic impacts. The calculation shows that the Clifton Common development will lead to 2,950 new trips to site between 8am and 9am. The information provided suggests this calculation is incorrect and the figure should be 4,366 new trips. Again the report potentially significantly underestimates the impact. The report discusses several 'Key Impacts on Junctions and Corridors' and frequently refers to existing congestion in and around the Brighthouse area. To exacerbate the series of potential underestimates included in the report, it makes absolutely no reference to types or volumes of commercial traffic which will be associated with the industrial development on the Clifton Common site or the inevitable impact on local traffic infrastructure. Clifton Common site The Clifton Common site in particular has been part of previous Local Plans since the year 2000. If the development has yet to materialise it can only be concluded that either the site is inappropriate, or that the need, just doesn't exist, either way it is not commercially viable. Clifton Common and Coal Pit Lane are completely unsuitable access routes for the types of commercial vehicles that would service the type of industrial development that is being proposed. The site slopes sharply down towards Wakefield Road and is likely to be littered with historic mineworkings. The site is completely inappropriate for the type of development that is being proposed.
 Conclusion In conclusion, I believe this response outlines the strength of evidence against the Local Plan in its current form. Whilst a degree of development is inevitable, the proposals for the Brighthouse area are disproportionate and do not meet the needs of the local residents, or indeed the wider population of Calderdale. I wholeheartedly support and endorse Clifton Village Neighbourhood Forum's response to consultation and also CVNFs letter to the Department of Transport dated 4th September regarding Calderdale MBCs 'Clifton Business Park Transport Network' funding application from the 'National Productivity Investment Fund'.

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

Duty to Co-operate Reason:

There is significant over-lap and interaction with neighbouring plans in particular Kirklees' plans for Bradley Park, Cooper Bridge and Mirfield and there is little evidence to suggest that there has been a co-ordinated approach or any sort of co-operation between the two authorities in preparation of the respective Local Plans.

Suggested Modifications:

A comprehensive review of the supporting evidence is required, as per my previous comments.

Additional Evidence Link:

Comment ID **Lpp95**

Site ref (if applicable): **LP1463**

Person ID: **817527**

Name: **Miss Nicola Denford**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Disproportionate Allocation: I strongly object to the disproportionate allocation of sites within the Local Plan, in that the Council has clearly chosen to include a vast number of sites to the east of Calderdale, in particular, Brighouse - effectively citing that they are 'easier to develop'. Brighouse is not the largest town in Calderdale, but it is being selected for the largest number of houses and the largest site (2000 houses in Clifton). The total number of proposed new dwellings in Calderdale is 9,460, of which, the total number for Brighouse and Rastrick is 4,633 - effectively half of Calderdale's total allocation, which is totally disproportionate (see Table 6.10). Additionally, 2 sites - the so-called garden suburbs - in Brighouse and Rastrick - are for 3,255 dwellings, which is around one third of Calderdale's total new housing allocations. So, one third of the allocations for Calderdale is to be on 2 sites, which are currently high-performing green belt and which do not have the required infrastructure in place, nor has this infrastructure been adequately planned to be implemented prior to any building taking place. In other words, these sites are currently not deliverable. It would appear that other more suitable sites have been overlooked by the Council; and when other areas received reductions in proposed new housing allocations by a total of 4,000 dwellings earlier this year, Brighouse sites remained much the same. The following comments from the Council about a proposed 'urban extension', which was filtered, sum up the Council's absolute determination to develop and decimate the Brighouse area: 'This site was considered for allocation as a Sustainable Urban Extension in the 'Potential Sites and Other Aspects of the Local Plan' consultation in 2015, along with 13 other areas identified as potential urban extensions. The balance of evidence indicates that Brighouse and Rastrick will be the key focal points for new residential development. This is due to the availability of land and their relative sustainability, with fewer potential impacts on the important environmental designations in the west of the District. Brighouse and Rastrick are close to the M62 and the border with Bradford and Kirklees. Brighouse as a town is also likely to benefit from capacity improvements to the A641, A644 and potentially also a new M62 junction 24a which could all be delivered through the West Yorkshire + Transport Fund.' What about Green Belt and local wild-life? What about Air Pollution? What about the potential of a further 9,000 vehicles in Brighouse (not forgetting the additional vehicles from houses in Kirklees just a couple of miles away)? How can this be considered a robust plan, when a third of the proposed new housing is on 2 huge areas of Green Belt, which don't have the required infrastructure in place? Despite their protestations otherwise, Calderdale have overlooked other (less attractive to developers) sites - particularly derelict and brownfield sites. Why is the environment and green belt in these areas any less important than anywhere else in the region? Just because Brighouse and Rastrick is close to the Motorway should not be a reason to suggest the building of up to 5,000 new homes. The roads are already massively congested in this area, and the residents of these new houses will presumably be attempting to join the M62 when commuting. However, it should be noted that this stretch of the M62 is generally at standstill with current levels of traffic, so these additional vehicles will be going nowhere. Yes, there is a need for more housing across the whole region, but when you look at the map and the numbers of proposed houses, it is absolutely clear that this is a totally unfair distribution of sites. My suggestion would be for the proposed developments to be spread more equally throughout the whole of Calderdale, with all possible brownfield sites and empty properties/disused sites being developed as a priority, before green belt is even considered. Green Belt: This proposed 'garden suburb' is situated in an area of existing green belt, which in itself should be reason enough not to develop the land. In addition to this, the Council spent months (and thousands of pounds of tax-payers' money) devising the methodology for a green belt review, and then further months reviewing all the green belt areas in Calderdale. In respect of the green belt review concerning the land at Clifton, the outcome for much of the land was 'Most Sensitive Green Belt Parcel'. One would therefore question, what was the point of carrying out the extensive reviews, if land classed as 'Most Sensitive', is then going to be put forward for development - in the case of LP1463, the largest proposed development in the whole of Calderdale? The Council's comments on this site were: 'The site performs an important role in safeguarding the countryside from encroachment'. My comments above are not reserved purely for LP1463, but relate to the blatant disregard in the Calderdale Local Plan for the fundamental aim of Green Belt Policy - namely, to prevent

urban sprawl. Calderdale Spatial Planning should be looking to develop brownfield sites and to regenerating disused sites, before they take the "easy option" (and the option which is preferable to developers) of wiping out our areas of green belt. Developers do not care about green belt, nor do they care about the opinions of local communities! At what point did hitting target figures for new housing become more important than retaining high-performing green belt? The green belt areas which are being proposed for development are a 'licence to print money' for property developers: unspoilt green belt in areas of Calderdale which have higher than average property pricing. In other words, the Local Plan which has been put forward is not an honest and well thought out proposal to fulfil affordable housing needs "" rather a means for developers to reap the benefits (in the £ millions). In their Technical Paper detailing 'Exceptional Circumstances for the release of Green Belt' Calderdale states: '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' These are just empty words with which I, for one, cannot agree.

Open Space: The Council describes this area of Green Belt as 'natural/semi-natural open space' and the Open Space RAG states 'No loss/No impact'. It would appear that when the detailed report was carried out for the proposed "Garden Suburb" no survey was carried out on the amount of people who use Thornhills Lane/Thornhills Beck Lane/Jay House Lane for recreational purposes. This area is used not only by people from Clifton and Brighouse, but also on a daily basis by people from further afield - for cycling, horse riding, walking, dog walking etc. It is an area of natural beauty, with green fields and abundance of wildlife. The Thornhills Lane area is an historical hamlet with the lane itself having been an original coach road. This is green belt, unspoilt and natural. A so-called "garden suburb" (otherwise known as a housing estate) would only be able to provide a limited amount of artificial green spaces and cycle routes. Additionally, This area of unspoilt green belt is home to and abundance of wildlife: foxes, deer, hedgehogs, hares, bats - not to mention multiple species of birdlife, which have been allowed to thrive in the areas of open farmland, hedgerows and woodland. The proposed plan to build up to 2,000 houses on this land will wipe out the habitat of these animals and birds.

Air Pollution: The traffic in Brighouse is overly congested on a daily basis, and this is with the current levels of housing/vehicles. If you look at peak times and days when there is an accident on the motorway when traffic pours off the motorway to find a quicker route, only to become stuck in traffic jams on every route in and out of Brighouse. This standing traffic and the proximity of the motorway creates high levels of air pollution, which are creating health issues in the area. To propose so many additional houses and in turn so many (up to 9,000 additional vehicles) for Brighouse and Rastrick, when the air quality is already poor, due to the proximity of the M62, is sheer madness. This major issue which affects the health of so many, has not been adequately addressed. Calderdale is one of 23 Local Authorities in England that have not met their Air Quality targets. Yet they are proposing to build over 4,500 homes and an Employment Zone in an air quality management zone, how do they propose to manage the increase in vehicle emissions that will result. There is a proven correlation between poor air quality and adverse health impacts. How does the council intend to mitigate this given the development that is going to take place in Brighouse?

Infrastructure: The Local Plan proposes major developments "" garden suburbs "" in Brighouse, where infrastructure is entirely lacking and unplanned/not committed, and without any clear or up to date infrastructure delivery plan. In the Site Report for LP1463 the Council acknowledges that this is the case and that this will restrict any development until much later in the Plan period. As mentioned, one third of the allocations for Calderdale is to be on 2 sites, which are currently high-performing green belt and which do not have the required infrastructure in place, nor has this infrastructure been adequately planned to be implemented prior to any building taking place. In other words, these sites are currently not deliverable . Not only are the current roads in Brighouse unable to cope with any additional traffic, but also the local schools, doctors etc are oversubscribed "" all these factors require addressing.

Community Support: My understanding is that to enable garden suburbs to be successfully implemented, they should have the support and backing of the whole community, and I think it is fair to say that the 2 proposed garden suburbs in Thornhills and Woodhouse do not have the support of the community "" quite the opposite, in fact. It is also important for the local community to be engaged

at an early stage - and this is a prime example of a proposal which the local community has never been consulted upon, until now. The "garden suburbs" proposal was 'pulled out of a hat', at the last minute - i.e. November/December 2016 - and nobody in the local community had any idea about this until the proposal was published in the local paper. This is a plan which clearly does not take into account the best interests or views of local residents. It is particularly disappointing that the Council would not grant the Clifton Forum Neighbourhood Forum Status, until the residents of Thornhills (those people who stand to be most affected by the development of LP1463) were removed from the inclusion zone of the Forum. There were 142 comments made in relation to this site last year "" the vast majority opposing the development, with detailed and informed comments put forward "" see link below:
http://calderdale.objective.co.uk/portal/planning_services/lp17/lpid?pointId=s1492590731563#section-s1492590731563 Failure to adequately Publicise the Local Plan: I would suggest that Calderdale Council has failed to adequately inform all residents of Calderdale about the Local Plan throughout the process. There are still plenty of people who haven't heard of the Local Plan; and given the importance and far-reaching effects of this document, I find it incredible that the Council has not sent a letter to each and every residence. This could have even have been sent out with the Council Tax Bills, giving annual updates and information. Yes, workshops and meetings have been held, but these have only been attended by those people who have been alerted to the possibility of proposed housing developments nearby. Of those people who are aware of the Local Plan and who wish to comment, they have been faced with a complex means of commenting on the Calderdale website, which is clearly off-putting for many people. The fact that there have been relatively few comments in relation to the number of residents in Calderdale, does not mean that people agree with the Local Plan, it purely reflects the fact that not enough people are aware, and of those that are aware, they have not been presented with a user-friendly method of commenting. Failure to Consult with neighbouring Councils: Calderdale appears to have failed to take into account the proposals included in the Kirklees Local Plan (which is much further ahead in the process than the Calderdale one) "" see the following points, to name but a few: There are 1,577 houses in Kirklees Local Plan planned for development at Bradley (Site Ref 1747), which is just across the other side of the Motorway from the Woodhouse site. So, the Bradley site plus the Woodhouse site will equate to 3,000 properties proposed, plus another 2,000 properties at Thornhills, Clifton. That is 5,000 houses on only 3 sites within a few miles of one another. This will mean up to an additional 10,000 cars from these 3 sites alone, which will all feed into the same transport network, including the M62 which is frequently at a standstill at peak times, and whenever there is an accident. Additionally, Calderdale is suggesting an Enterprise Zone at Clifton, when there are multiple proposed business sites in Kirklees, just across the boundary at Bradley and Mirfield and beyond, which would certainly be more attractive to companies looking to invest, as the proposed land is not steeply sloping sites, which the Clifton site is.

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

Duty to Co-operate Reason:

See comments above.

Suggested Modifications:

Additional Evidence Link:

Comment ID **Lpp975**

Site ref (if applicable): **LP1463**

Person ID: **1139631**

Name: **Mr David Smith**

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?: **No**

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/5077003>

Comment ID **Lpp982**

Site ref (if applicable): **LP1463**

Person ID: **1182808**

Name: **Mr David Smith**

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:

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

Duty to Co-operate Reason:

Suggested Modifications:

1. There is a disproportionate allocation of houses (2,000) allocated to Clifton and the surrounding area. 2. The infrastructure is insufficient to cope with an additional 2,000 homes - no provisions for extra doctor's surgery or school - and no upgrades to roads to cope with extra congestion. 3. No account has been taken of the ecology of the Green Belt land around Clifton. 4. The Community Infrastructure Levy-effectively subsidises the development by being set at a low level. 5. The topography of the land is too steep to safely develop. No account has been made of the access of emergency vehicles through the existing road network. 6. The designation of an Enterprise Zone is not justified. The council will receive less rates and a large part will go to the West Yorkshire Combined Authority - depriving funds for local expenditure.

Additional Evidence Link:

Comment ID **Lpp995**

Site ref (if applicable): **LP1463**

Person ID: **1132040**

Name: **Mr David Watson**

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/5078842>

Comment ID **Lpp996**

Site ref (if applicable): **LP1463**

Person ID: **11354**

Name: **Mrs Patricia Watson**

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/5078842>

Main Issues and Council Response

Legal Compliance

Main Issues:

1. Inaccurate and insufficient information has been used to progress the Local Plan.
2. The latest consultation only lasted 6 weeks. Consultation period not sufficient and deliberately carried out during the summer holidays to limit responses.
3. Inadequate involvement of the public in the plan making process. Format of consultation was not effective and not sufficiently open or accessible.
4. Council has failed in its obligation to meaningfully engage a wide range of the Calderdale population.
5. Over reliance on the internet and social media for consultation.
6. Not enough use of internet and social media for consultation.
7. The Council did not reply to Regulation 18 comments which is not procedurally correct and demonstrates a failure to consult with the local community.
8. There is no mechanism to see changes from previous versions of the Local Plan.
9. The Local Plan Policies map is significantly misleading in that the Garden Suburbs show only as Garden Suburbs but not housing sites.
10. The Plan is not consistent with National policy and legislation.
11. A number of land owners within the site were not contacted about this site until they raised this issue during consultation.
12. Deliberate decision not to allow the residents of Thornhills Hamlet to become members of the Clifton Forum as those residents are the ones most affected by this development.
13. The plan should have regard to the planning guidance incorporated in the West Yorkshire Low Emission Strategy (WYLES).
14. Development of the site would be contrary to Coal Authority advice.
15. The Local Plan had been prepared without a sound rationale or co-ordinated evidence base.
16. The Council has failed to listen to the objective evidence put forward by the Clifton Neighbourhood Forum.
17. Sustainability Appraisal was not available for comment.
18. The poor quality, lack of accuracy and incompleteness of the Plan and the supporting evidence mean the Local Plan is not legally compliant.
19. All the information available to the Council has not been made available to the public.

20. The Local Plan violates the Human Rights Act.

Council's Response:

1. – 8. 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.
7. / 8. Specific responses to individual comments have not been made as these are not required by regulations.
9. The Garden Suburbs are highlighted differently to New Housing Sites on the Policies map as there are other uses included in the Garden Suburbs such as open space, schools and facilities.
10. The Council considers the Plan sound and the Local Plan Examination will determine this.
11. All land owners were contacted in 2017 and 2018 to confirm land availability of sites. Example questionnaires are located in Appendix 10 of the Site Allocations Assessment Methodology Statement. (EV51.9)
12. The Local Plan Examination Process can not comment on the boundaries of Neighbourhood Plan Areas.
13. The Plan does have regard to West Yorkshire Low Emission Strategy. In Chapter 21 – Environmental Protection it is referred to in Pollution Control and within the monitoring of the Policy.
14. SS36 - LP1463 - Stage 1 Desk Study Report explores Coal Mining Legacy and concludes that a detailed coal mining risk assessment is undertaken, however, given the size of the site, and extent and complexity of the geology and works, this lends itself to division of the site into smaller more manageable parcels and phasing.
15. The Council considers that the evidence submitted supports and justifies the content of the Local Plan.
16. The Council has considered all evidence put forward by all groups in accordance with the Council's adopted Statement of Community Involvement and is detailed in the Consultation Statement (Regulation 22) which sets out how the comments made during the pre-Publication stages have been taken into account.
17. The purpose of the SA is to inform the plan preparation process by appraising the Local Plan's Objectives, Policies, and Allocations in relation to their sustainability, establishing their likely impacts, cumulative impacts, and the scope for mitigating any possible negative impacts.
18. The Council considers that the evidence submitted supports and justifies the content of the Local Plan.
19. All information has been added to the website and made publicly available. All evidence on sites will be made available for the Examination process.
20. There is no basis for this assertion.

Test of Soundness

Main Issues:

Green Belt

1. Loss of highly sensitive Green Belt.
2. Lack of exceptional circumstances.
3. This allocation and the adjacent employment site by Coal Pit Lane will result in the village of Clifton being merged into Brighouse.
4. The proposed Garden Suburb would negatively impact on the openness of the Green Belt.
5. Development would undermine purposes of including land in the Green Belt and is contrary to Green Belt policy.
6. Disproportionate impact on Green Belt across the Borough.
7. The Local Plan contravenes the directive from central government that protection of the Green Belt is paramount.
8. Results of Green Belt Review have been ignored.

9. Utilise brownfield sites first.

Site Access

10. The site is located at a high elevation and adverse weather in winter will affect access.

11. The ford on Thornhills Lane is not passable by car after heavy rain.

Availability

12. There are at least 11 different landowners with only one having a development agreement in place.

Delivery

13. The Local Plan does not allow enough time for land assembly.

14. The Council's Objectively Assessed Need (OAN) is too low.

15. The start date and delivery timescales are inflated and unrealistic with an unsustainable growth strategy focusing on the South East of the District.

16. Topography of the site is too steep to safely develop.

17. Lack of detailed site assessments and evidence to verify the deliverability of sites.

18. There is no mention of other delivery partners being signed up to the Local Plan.

19. There is no land set aside for employment use in this allocation.

20. A developable area for the site should not be identified at the allocation stage of the planning process, this should be a matter for detailed design at the application stage.

21. No comprehensive masterplan is included in the Local Plan. Inclusion of this ensures that different

parts of the site can be delivered cohesively and optimise site yield.

22. Development is potentially unviable unless affordable housing policies are ignored and an almost zero CIL rate is applied.

Infrastructure

23. Lack of/pressure on existing amenities, services and facilities in the local area, e.g. schools, shops, doctors, public transport. There is no guarantee that the necessary infrastructure will be provided for this development. Provision of infrastructure will need to be phased in line with development of site.

24. IDP is not fit for purpose as it does not detail the required infrastructure improvements.

25. Site Specific Consideration regarding contribution to schemes identified by Highways England and the IDP should be proportionate to the scale/nature of development and its impact, and should be evidenced.

26. CIL has been set deliberately low to attract contractors; this in turn has reduced the possibilities of generating the necessary funding for required infrastructure.

Local Road Network

27. Inadequate local road network, specifically congestion and on-street parking, giving rise to safety issues. A644 Wakefield Road, Clifton Village, Thornhill Briggs Lane, Jay House Lane and Brighouse town centre are specifically mentioned.

28. Proposed improvements to local road network are inadequate.

29. Given that Brighouse provides a main access route to Kirklees and Bradford, its traffic issues cannot be considered in isolation.

Strategic Road Network

30. The plan seems dependent on the proposed motorway junction (24a) which may not be delivered. Development of this site is premature without this.

31. Difficult to make informed comments with uncertainty over proposed Junction (24a) on M62.

32. Development of site would increase traffic using the M62.

Air Quality

33. Increase in traffic, negative impact on the Brighouse Air Quality Management Area, leading to health issues.

34. West Yorkshire Low Emission Strategy should not be considered a site specific consideration.

Pollution

35. Proposed development will give rise to an increase in noise pollution, general disturbance and odour.

36. The site has a Radon gas problem.

Land Contamination

37. Concerns over contaminated land.

Land Stability

38. There is evidence of land instability in the area due to mining. The Council is not in possession of maps to show all mine workings.

Heritage

39. As currently worded, the Site Specific Consideration in so far as it relates to the historic environment is Unsound as it is not likely to be effective.

40. Development of the site would give rise to a loss of heritage earthwork.

Ecology

41. The ecological and environmental impact of this allocation has been inadequately considered.

42. Impact on wildlife including local wildlife and woodland, BAP Priority Species, Protected Species, Wildlife Habitat network, and is contrary to the Calderdale Biodiversity Action Plan.

43. The councils own Assessment Report identifies a lack of data to be able to thoroughly and robustly assess the ecological impact.

44. Grasslands exist in the northern part of the site, however an ecological survey finds that these are unlikely to be of sufficient quality to be representative of Lowland Meadow Habitats of Principal Importance or quality as a Local Wildlife Site and should not be classed as a major constraint to development.

45. It is unjustified for the Wildlife Habitat Network to be excluded from the developable area of this site.

Open Space

46. This development will result in a loss of open space and footpaths.

47. Opportunities for outdoor sport and outdoor recreation near urban areas will be reduced or removed with negative impacts on physical and mental health.

48. The Calderdale Way Footpath follows Thornhills Lane and crosses through the site.

49. Allocation is contrary to Green Infrastructure policies in the Local Plan.

Flooding and Water Management

50. Development of site will give rise to increased surface water run off which will increase flood risk.

51. Evidence of flooding events locally.

Health and Wellbeing

52. The impact on health has been inadequately assessed.

53. Development of site would have a negative impact on the health and wellbeing of the local population.

Other

54. The Local Plan is not positively prepared.

55. Errors in site reports make allocation unsound.

56. Allocation of this site is contrary to Local Plan policies SD1 and SD7.
57. Disproportionately high level of development allocated to Brighouse and Rastrick compared to rest of Calderdale. Halifax is the principal town and should take the highest level of development. The housing numbers are a political decision that ignores the views of local residents.
58. The site can accommodate more dwellings than stated in the policy.
59. Terminology of Garden Suburb should not be used as it implies that they support open space and natural habitats but instead result in the loss of large areas of Green Belt.
60. There is insufficient evidence in the Plan to show how the Council proposes to overcome the many constraints of developing the site.
61. Site Specific Consideration regarding Wildlife Habitat Network contradicts Policy IM7, and is not effective.
62. The foundations of the Local Plan are no longer valid since Brexit in terms of immigration, population, economic growth and therefore neither are the proposed levels of housing need and job creation.
63. Allocation of this site for development contravenes the guidance contained in the NPPF.
64. Development of this site will give rise to a loss of high quality agricultural land and will impact local food production.
65. Development of this site will give rise to a loss of grazing land.
66. The plan does not conform with its own strategic objectives, in particular SO1 - Sustainable Development; SO2 - Climate Change; SO4 - Housing; SO5 - Green Infrastructure & Natural Environment; SO7 - Transport; and SO8 - Communities & Narrowing the Gap.
67. The proposed development will cause landscape degradation.
68. The 'Garden Suburb' has not been properly defined.
69. The number of empty houses in the District has not been taken into consideration.
70. The plan is not deliverable as it relies on delivery of both garden suburbs in South East Calderdale to meet the basic housing requirement.
71. Housing mix will not provide affordable homes and will most likely consist of executive homes.
72. Brighouse with its easy access to the M62, would increasingly become a dormitory town for the surrounding cities of Bradford, Leeds and Manchester.
73. There are areas within Calderdale that are being unfairly denied investment and development opportunities by focusing development in the Brighouse area.
74. Site is located in a Mineral Safeguarding Area in the Local Plan.

75. Allocation of site will have a negative impact on local property values.

76. The Employment Land study is still in draft form and is incomplete and inaccurate.

77. Large scale development will give rise to an increased fear of crime.

78. All of the development proposed in South East Calderdale and on or near the Kirklees border will have a cumulative negative impact.

79. Major housing development in this location will only serve those working in Kirklees, Leeds, Bradford and Manchester.

Council's Response:

1 – 9 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. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the Council has examined fully all other reasonable options for meeting its identified need for development

Using the same methodology as the Green Belt Review, proposed development sites in the Local Plan that are located in the Green Belt have been assessed against the Green Belt purposes in the NPPF using the boundaries of the site itself. During that assessment, a series of questions were asked in order to test whether development of the site would lead to the coalescence of towns and unrestricted urban sprawl, along with questions relating to ribbon development and encroachment.

In terms of comments relating to the distribution of development, 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.

As part of the methodology, questions were asked as to whether there is a robust, permanent Green Belt / development boundary and whether natural features and infrastructure provide a good physical barrier or boundary to the site that would ensure that development was contained. Where sites have been proposed in the Green Belt, a site specific consideration will ensure the creation of a strong and defensible boundary between the allocation for housing and the Green Belt.

10. / 11. Site access is achievable; however, given the size of the site, several access points will be required. ID Planning are working on behalf of the land owners to submit all the relevant studies to demonstrate the suitability of this site including a masterplan and transport assessment are available in the Examination Library under SS36-LP1463.

12. / 13. 'Statements of Common Ground' (CC07) and 'Memorandum of Understandings' have been drafted between Land Owners, Agent and the Council which demonstrates the availability and agreement to deliver this site. The revised start date and delivery times of the garden suburbs are set out in the SoCG.

14. The Local Housing Needs are established using the new Standard Methodology. Earlier consideration of the SHMA derived Objectively Assessed Needs were indeed higher in terms of housing requirement but the Council has chosen to follow the LHN.

15. The Sustainability Appraisal (SD03.2) has assessed the Garden Suburb Approach and the “Pepper Potting” approach of sites around the district and found that the Garden Suburb Approach would provide the best opportunity to ensure high quality design, reduce the risk of impact on international and national areas of protection and conservation, increase the accessibility to services including public transport, health and education, as well as access to employment opportunities. The revised start date and delivery times of the garden suburbs are set out in the SoCG (CC07) between the Council and ID Planning.

16. Those areas of particular topographical constraints would be free from development if deemed through a topographical survey that these areas are not safe to develop. Due to the size of this this lends itself to division of the site into smaller more manageable parcels and phasing.

17. Evidence Document EV 51.1 Site Allocations Assessment Methodology - Publication Draft (2018) details the process the Council has followed in relation to the site assessment process. The document outlines the various stages of assessment from initial site identification to the implementation of the Sequential Approach. ID Planning are working on behalf of the land owners to submit all the relevant studies to demonstrate the suitability of this site including a masterplan and transport assessment are available in the Examination Library under SS36-LP1463.

18. There is not a requirement for delivery partners to be signed up to the Local Plan. However, in terms of the site, there has been early marketing and developer interest in Phase 1 of the site.

19. The Employment Land Study (EV01) and Employment Technical Paper (EV02) sets out the Employment Land to meet the Objectively Assessed Need. The sites allocated for Employment meet this identified need without using land within the Garden Suburbs. The Garden Suburbs main objective is to meet the housing requirement however there is scope to include small scale services/facilities to meet residents need.

20. An indicative developable area is considered to be necessary in order to determine an indicative site capacity. The indicative developable area is based on constraints identified in the site assessment process. The indicative developable area may be subject to changes when an actual development scheme is drawn up.

21. There has been a number of illustrative masterplans to demonstrate the deliverability of the site. Furthermore, in accordance with Policy IM7, the production of a master plan for strategic housing sites will be required at Application stage.

22. ID Planning has indicated that the site is viable under all policy and infrastructure scenarios and will submit the evidence in due course.

23. / 24. / 25. The Local Plan is supported by the Infrastructure Development Plan which sets out the infrastructure requirements resulting from the growth proposed in the borough. The IDP has been updated to include a table setting out the Local Plan housing trajectory and the provision of critical infrastructure. This table shows the cumulative trajectory; the individual infrastructure projects that need to be delivered by that point in time; funding status; regulatory status; construction status and lead agency/partners. The Primary School space standards will be assessed at application stage.

The IDP sets out the infrastructure required to support the level of development that is proposed in the

Local Plan.

26. The CIL will help to deliver the Calderdale Local Plan (and Site Allocations Plan once adopted) by bringing in funding for infrastructure to support new growth. It is set at rates which are considered will not deter the development and growth as set out in the Local Plan, or impact on affordable housing provision.

In setting the levy rates, Calderdale Council considers it has struck an appropriate balance between;

- a. the desirability of funding from CIL in whole or in part the actual and estimated total cost of infrastructure required to support the development of its area, taking into account other actual and expected sources of funding, and
- b. the potential effects, taken as a whole, of the imposition of CIL on the economic viability of development across the Calderdale District.

27. - 29. This site is likely to have significant traffic impact flows in central Brighouse and on the strategic road network when fully developed. Several junctions are likely to require mitigation. CMBC Highways Development Management Officers have requested a masterplan for the whole site and a Transport Assessment to demonstrate the mitigation to ensure the proposal would not have a severe impact. ID Planning are working on behalf of the land owners to submit all the relevant studies to demonstrate the suitability of this site including a masterplan and transport assessment are available in the Examination Library under SS36-LP1463.

30. – 32. There are likely to be impacts on the Strategic Road Network as a result of developing this site. Highways England have suggested that this site may need to deliver or contribute to the additional schemes identified by the Highways England West Yorkshire Infrastructure Study and included in the Infrastructure Delivery Plan.

West Yorkshire Infrastructure Study identifies further capacity enhancement needed 2022 and 2030.

The Local Plan is not predicated on the delivery of Junction 24A. The intervention is not a critical to the delivery of the growth scenarios proposed in the Local Plan.

33. – 37. Environmental Health considers the development of the site could result in adverse impact upon the Brighouse Air Quality Management Area. There could also be impacts from turbines and potential of noise and shadow flicker. Contaminated Land has also been identified. Therefore these issues need to be investigated and mitigation measures put in place where necessary.

The West Yorkshire Authorities have jointly produced the West Yorkshire Air Quality Technical Guidance and the West Yorkshire Low Emissions Strategy in consultation with Public Health England in order to reduce harmful emissions and improve air quality. This work is reflected in the Local Plan policy on Air Quality and in the land allocations assessments, including referencing the above documents where mitigation measures are required. WSP in their transport modelling for the Local Plan also considered key air quality elements providing evidence able to be utilised in further strategic work on air quality.

38. There has been no evidence provided which substantiates the claim that the land is unstable. Where land stability issues do arise a planning application will have to be accompanied by a land stability assessment and mitigation measures.

ID Planning have commissioned a report SS36 - LP1463 - Stage 1 Desk Study Report which explores land stability and concludes that a detailed coal mining risk assessment is undertaken, however, given the size of the site, and extent and complexity of the geology and works, this lends itself to division of the site into

smaller more manageable parcels and phasing.

39. / 40. The Grade II Listed Buildings of Woolrow and Woolrow Farmhouse are in close proximity of the northern boundary of the site. The site provides important rural setting of the listed farmhouses as highlighted by historic England. A Heritage Impact Assessment has been undertaken which identifies impacts and potential mitigation measures to reduce harm to heritage assets. The HIA also recommends a detailed masterplan addressing the points raised in the HIA. One of the main recommendations is to remove from the developable area a buffer around the Listed Buildings of Woolrow Farmhouse.

The Council would expect any application to consider the recommendations provided within the HIA.

The Heritage Impact Assessments have been prepared with reference to the assessment methodology provided in Historic England's Advice Note 3: The Historic Environment and Site Allocations in Local Plans (2015); Good Practice Advice in Planning 2: Managing Significance in Decision-Taking in the Historic Environment (2015); and Good Practice Advice in Planning 3: The Setting of Heritage Assets (2015).

The purpose of the Heritage Impact Assessment (HIA) is to inform the site allocation process of the Local Plan. Through assessment of the significance of the historic environment, the likely impact of allocation on affected heritage assets, both designated and non-designated, is identified and consideration given to whether such impact can be mitigated.

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.

41. In terms of ecology, there are some areas of relatively species rich acid and neutral grassland likely to be UK Biodiversity Action Plan priority habitat. There is also lowland mixed deciduous woodland along the disused railway corridor. The Calderdale Wildlife Habitat Networks also crosses the site. West Yorkshire Ecology has recommended these areas are removed from the developable area, and provision is made for on-going grassland and woodland management. The Council's Conservation Section (Ecology) considers that some development of this site would be acceptable, however they deem the ecological information provided so far insufficient. The Conservation Section has required an Ecological Appraisal to be undertaken prior to the production of a revised masterplan. This should include the results of ecological surveys (such as Phase 1 habitat, botanical, protected species and ornithological surveys) and an ecological record searches with West Yorkshire Ecology and the Calderdale Bird Conservation Group and should be sufficiently detailed to identify ecological constraints, highlight opportunities for ecological enhancement and make recommendations for design and allow significant adverse ecological adverse effects to be avoided or minimised wherever possible. After the master plan is produced, an Ecological Impact Assessment and Ecological Management Plan will be required which should comply with CIEEM guidance.

ID Planning are working on behalf of the land owners to submit all the relevant studies to demonstrate the suitability of this are available in the Examination Library under SS36-LP1463.

46. – 49. Development would result in no loss of designated Open Space, it 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. Due to the scale of this site, there is scope to provide open space within the development which needs discussion as the development is progressed. The visual

impact of any development should be considered and the safeguarding of the public right of way.

50. – 51.

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 Flooding and Drainage Section of the Council considers the site suitable for development subject to capacity building of existing drainage network and well planned site investigations. Topography and water features that affect the layout of the development will also need to be considered. It is recommended SuDS to be included to mitigate against potential increase of surface water flooding.

The NPPF makes it clear that 'inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere'. Supported by the Calder Catchment Strategic Flood Risk Assessment 2016 (SFRA), the Local Plan is focused upon managing flood risk from all sources and applying a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change.

ID Planning are working on behalf of the land owners to submit all the relevant studies to demonstrate the suitability of this are available in the Examination Library under SS36-LP1463.

52. / 53. Development of this site will have to be in line with Local Plan Policy 'HW3 – Well Being', 'BT1 – High quality, inclusive design', and 'GN4 – Landscape Character'.

54. The Council considers that the Plan has been prepared positively.

55. Evidence Document EV 51.1 Site Allocations Assessment Methodology - Publication Draft (2018) details the process the Council has followed in relation to the site assessment process. The document outlines the various stages of assessment from initial site identification to the implementation of the Sequential Approach.

56. The Council considers the Plan is in line with SD1 and SD7.

57. The Council has not used the settlement hierarchy as the basis for the distribution of development. During early stages of plan preparation the Regional Strategy assumptions regarding distribution were used. In this case, Halifax had to take over 50% of the growth, with Brighouse taking a further significant proportion. As the Local Plan developed and the work was undertaken to understand the implications of the potential growth, it was found that Halifax could not accommodate as much developments as originally sought, because of the potential for significant effects upon the SPA and SAC as identified through the HRA process. South East Calderdale therefore became more attractive as a potential location for significant development.

58. Density multipliers were considered in order that the site capacities were reflected as accurately as possible, and without overstating capacity. The density multipliers agreed by the SHLAA Working Group were based on those included in 'Tapping the Potential'⁷ published in 2000. These have been used in assessing the housing allocations in order to determine indicative site capacity.

59. The intentions of the "Garden Suburbs" have been set out in the Vision, Planning for Growth and Masterplan Policy sections of the Local Plan; as well as the 'Strategic Vision for South East Calderdale' (EV39). Although the site is not part of the Government's Garden Community Prospectus the principles of "garden cities" have been used to great effect to ensure enhanced local facilities and infrastructure, quality

of design contribute to the sustainable development of these sites.

60. There are no insurmountable constraints identified by our statutory and internal consultees which would indicate the site is not developable. ID Planning are working on behalf of the land owners to submit all the relevant studies to demonstrate the suitability of this are available in the Examination Library under SS36-LP1463.

61. An application would have to meet the requirements of IM7. The ecological constraint highlighted in Appendix 1 – Site Allocations Supporting Information would need to be given due consideration by those wishing to bring a scheme forward on the site.

62. The Plan has made use of the nationally established Standard Methodology for determining Local Housing Needs. Separate work on the potential effects of Brexit are neither appropriate nor possible at the local level in the context of a national methodology. The Employment Technical Paper (EV02) sets out the economic growth and job creation.

63. The Local Plan has been prepared in line with NPPF and PPG.

64. / 65. The site consists of predominantly Grade 3 Agricultural Land which is not considered “high quality”.

66. The Council considers that the development of this site in line with the policy’s of the Plan will meet the strategic objectives in the Local Plan.

67. Development of this site will have to be in line with policy ‘IM7 – Master Planning of Housing Sites’ whereby high standards of design will respect the character of the landscape; ‘BT3 – Landscaping’ where landscaping will need to enhance the landscape character; and ‘GN4 – Landscape Character’ which ensures new development is design in a way that is sensitive to its landscape setting, retaining and enhancing the distinctive qualities of the landscape area in which it is situated.

68. The intentions of the “Garden Suburbs” have been set out in the Vision, Planning for Growth and Masterplan Policy sections of the Local Plan; as well as the ‘Strategic Vision for South East Calderdale’ (EV39). Although the site is not part of the Government's Garden Community Prospectus the principles of “garden cities” have been used to great effect to ensure enhanced local facilities and infrastructure, quality of design contribute to the sustainable development of these sites.

69. Consideration of empty homes has been considered. (See para. 6.4 of the Local Plan) however, due to the difficulty in quantifying the contribution empty properties may make to delivering housing over the plan period the figure has not been included in the source of housing supply. Calderdale Council are actively pursuing initiatives to bring empty properties back into residential use.

70. NPPF 2019 (paragraph 33) requires policies in Local Plans to be reviewed in order to assess whether they need updating at least once every 5 years and then be updated as necessary. Therefore any issues with sites not coming forward will be addressed well before the end of the Plan period. Other relevant factors include the fact that provision in the Plan reflects a significant step change in delivery, an increase in supply will not necessarily equate to greater delivery as the market will only bring forward development at a rate where it is profitable to do so and assumptions for windfalls are relatively conservative.

71. Any planning application will have to be inline with Local Plan Policy ‘IM7 – Master Planning of Housing Sites’, ‘HS2 Residential Density’ and ‘HS3 – Housing Mix’ which will ensure a mix of properties to meet the Borough’s needs.

72. The large scale developments of the Garden Suburbs in Brighouse and that in Bradley, Huddersfield are part of an ongoing spatial consideration of growth within the Leeds City Region. The large sums being allocated by the West Yorkshire Combined Authority to the A641 Corridor and the Bradley Link indicate a joint consideration of the development implications. Council Document CC01 (Appendix 1.3) in response to the Inspectors Pre-Hearing Note 1 provides further information about the manner in which the Calderdale and Kirklees are working together to manage and mitigate the growth in the South East Calderdale/North Huddersfield area.

73. All constraints have been considered as part of the assessment of sites. The weight attached to protecting the Special Protection Area and Special Area of Conservation which are designated under European Legislation has been instrumental in diverting development away from the western part of the district and the north and west of Halifax. There is no built in bias in favour of placing development around Brighouse but this has become a logical conclusion of the informed by the evidence.

74. Before permission is granted it would be expected that as part of any planning application that 'Policy MS2 – Mineral Safeguarding Areas' is met.

75. This is unsubstantiated.

76. The Employment Land Study (EV01) is not in draft form and is available on the Examination Library.

77. Policy BT5 Designing Out crime ensures schemes include measure which will reduce opportunities for antisocial behaviour.

78. The large scale developments of the Garden Suburbs in Brighouse and that in Bradley, Huddersfield are part of an ongoing spatial consideration of growth within the Leeds City Region. The large sums being allocated by the West Yorkshire Combined Authority to the A641 Corridor and the Bradley Link indicate a joint consideration of the development implications. Council Document CC01 (Appendix 1.3) in response to the Inspectors Pre-Hearing Note 1 provides further information about the manner in which the Calderdale and Kirklees are working together to manage and mitigate the growth in the South East Calderdale/North Huddersfield area.

79. See Evidence Document EV 33 Housing Technical Paper (2018) (paras. 3.1 -4.4), CC 01 Calderdale Council Response to INS/01 – Response to Pre-Hearing Note 1 Appendix 1.5, Background Paper BP 01 Cabinet Report 12.2.18 Housing Requirements and Allocations and Evidence Document EV 09 Exceptional Circumstances for the Release of Green Belt (2019).

Duty to Co-operate

Main Issues:

1. Duty to cooperate does not consist of Calderdale and Kirklees allowing each other to do what they want without consideration of the consequences.
2. No evidence seen on consultation with Kirklees regarding their development on/near border.
3. The Council has not cooperated with Highways England.

Council's Response:

1. / 2. The DTC Statement and the Statement of Common Ground between Calderdale and Kirklees sets out

how the two Local Authorities have co-operated on strategic sites and other matters.

3. A Statement of Common Ground (CC03) between the Council and Highways England is available in the Examination Library.

Suggested Modifications

1. Amend the policy to reflect the site can deliver 2140 dwellings.
2. Remove the politics from the Local Plan.
3. The number of houses proposed for Brighouse should be reduced.
4. Assess the site against both the 2012 and 2018 NPPF.
5. CIL contribution for this site needs to be re-evaluated.
6. Amend Site Specific Consideration to "Contribute to the additional schemes identified by the Highways England West Yorkshire Infrastructure Study and included in the Infrastructure Delivery Plan where evidence demonstrates this necessary and appropriate".
7. Amend the Site Specific Consideration to "The function of the Wildlife Habitat Network will be maintained and enhanced where appropriate and practical".
8. Remove the allocation and retain as Green Belt.
9. Remove the allocation and designate as Open Space.
10. Remove this site from the Local Plan and use Brownfield land and derelict sites.
11. Build on smaller sites across Brighouse and the whole of Calderdale which will deliver housing where it is needed.
12. Amend the seventh Site Specific Consideration to read:-
"Implementation of the mitigation measures set out in the Heritage Impact Assessment"
13. Add the following additional Site Specific Consideration:-
"Development proposals will be required to secure the repair of the Grade II Listed Woolrow"
14. Garden Suburbs should be clearly defined.
15. The Plan needs to provide retirement homes.
16. Effective measures to address air quality issues in Brighouse need to be incorporated into the Local Plan.
17. A proper investigation of the sort of homes that are needed in the District should be completed and incorporated into the plan.
18. Revert back to the sites proposed in the 2017 LPID consultation.

19. More evidence is required detailing impact of allocation on Brighouse and surrounding areas.
20. A comprehensive review of the supporting evidence is required.
21. The proposed garden suburb at Brighouse should include an element of land for B class uses. If such uses are ultimately not provided for, then this should be justified by the Local Plan.
22. A detailed plan should be published showing phased provision of infrastructure in line with development of site.
23. IDP should detail the infrastructure improvements needed for the scale of development proposed.
24. Add requirement for Heritage Impact Assessment on close by Listed buildings and undesignated heritage assets, in Reports Required section, to supplement the pre-determination archaeological evaluation mentioned, to comply with the NPPF.
25. The traffic assessment for this site needs to include an interrogation of Calderdale's strategic transport model examining traffic volumes ('actual flow - total') as well as V/C ratios.
26. A developable area for the site should not be identified at the allocation stage of the planning process, this should be a matter for detailed design at the application stage.
27. West Yorkshire Low Emission Strategy should be removed from site specific considerations.
28. Site should be on a significantly smaller foot print of no more than 200 houses with a 20m green buffer between existing and new housing.
29. Full comprehensive master planning should be undertaken from the start with community involvement.

Council's Response:

1. The Council would be open to amending the capacity of the site. However, this will be explored at Stage 2 Examination Hearings based on further work being undertaken by ID Planning and the creation of a detailed masterplan.
2. The Plan has been prepared by Local Planning Authority Officers with it being approved at Full Council. – No change required
3. 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.
4. The Local Plan is prepared under the 2012 National Planning Policy Framework. – No change required
5. In setting the levy rates, Calderdale Council considers it has struck an appropriate balance between;
 - a. the desirability of funding from CIL in whole or in part the actual and estimated total cost of infrastructure required to support the development of its area, taking into account other actual and expected sources of funding, and
 - b. the potential effects, taken as a whole, of the imposition of CIL on the economic viability of development

across the Calderdale District.

6. / 7. The mitigation measures identified within the 'Site Specific Considerations' 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 further evidence, which may make varying recommendations in terms of mitigation to site constraints.

8. / 9. 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.

- It is considered that the exceptional circumstances have been demonstrated to justify the proposed changes to the Calderdale Green Belt boundary.

10. 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. – No change required

11. The Sustainability Appraisal (SD03.2) has assessed the Garden Suburb Approach and the "Pepper Potting" approach of sites around the district and found that the Garden Suburb Approach would provide the best opportunity to ensure high quality design, reduce the risk of impact on international and national areas of protection and conservation, increase the accessibility to services including public transport, health and education, as well as access to employment opportunities. – No change required

12. The purpose of the Heritage Impact Assessment (HIA) is to inform the site allocation process of the Local Plan. Through assessment of the significance of the historic environment, the likely impact of allocation on affected heritage assets, both designated and non-designated, is identified and consideration given to whether such impact can be mitigated.

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. – The Council is open to changing the wording without being restrictive.

13. The purpose of the Heritage Impact Assessment (HIA) is to inform the site allocation process of the Local Plan. Through assessment of the significance of the historic environment, the likely impact of allocation on affected heritage assets, both designated and non-designated, is identified and consideration given to whether such impact can be mitigated.

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.

14. The intentions of the "Garden Suburbs" have been set out in the Vision, Planning for Growth and Masterplan Policy sections of the Local Plan; as well as the 'Strategic Vision for South East Calderdale' (EV39). Although the site is not part of the Government's Garden Community Prospectus the principles of "garden cities" have been used to great effect to ensure enhanced local facilities and infrastructure, quality of design contribute to the sustainable development of these sites.

15. The Plan recognises the need to respond to an ageing society and the needs of older people.
16. The Council's response is set out in EV05 the Air Quality Technical Paper 2018 and EV04 the Calderdale Air quality Action Plan 2018. The Council's Local Plan transport evidence has looked at Emissions (EV54.8). The Low Emissions Strategy (2017) EV03; Air Quality Action Plan (2018) EV03 and Air Quality Technical Paper (2018) EV04 - these strategies and actions plans are working together to help reduce and manage emissions and improve air quality. The growth of employment alongside new homes in SE Calderdale will also provide opportunities for locally based employment reducing the need to travel, helping to manage emissions.
17. 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. The Housing Mix is based on the Housing Technical Paper (EV33) and Strategic Housing Market Assessment (EV36)
18. The sites proposed in 2017 LPID consultation included more sites than required for the Local Plan Publication draft housing requirement.
19. The SA informs the plan preparation process by appraising the Local Plan's Objectives, Policies, and Allocations in relation to their sustainability, establishing their likely impacts, cumulative impacts, and the scope for mitigating any possible negative impacts.
20. Evidence will be reviewed during the Local Plan Examination.
21. The Employment Land Study (EV01) and Employment Technical Paper (EV02) sets out the Employment Land to meet the Objectively Assessed Need. The sites allocated for Employment meet this identified need without using land within the Garden Suburbs. The Garden Suburbs main objective is to meet the housing requirement however there is scope to include small scale services/facilities to meet residents need.
22. / 23. The Local Plan is supported by the Infrastructure Development Plan which sets out the infrastructure requirements resulting from the growth proposed in the borough. The IDP has been updated to include a table setting out the Local Plan housing trajectory and the provision of critical infrastructure. This table shows the cumulative trajectory; the individual infrastructure projects that need to be delivered by that point in time; funding status; regulatory status; construction status and lead agency/partners.
24. A Heritage Impact Assessment has been undertaken by the Conservation Section (Heritage). This has been reflected in the Site Allocations Supporting Information.
25. The Council considers the modelling used is appropriate in order to allocate the site in the Plan.
26. An indicative developable area is considered to be necessary in order to determine an indicative site capacity. The indicative developable area is based on constraints identified in the site assessment process. The indicative developable area may be subject to changes when an actual development scheme is drawn up.
27. The mitigation measures identified within the 'Site Specific Considerations' 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 further evidence, which may make varying recommendations in terms of mitigation to site constraints.

28. This size of site would not meet our housing requirement.

29. In accordance with Policy IM7, the production of a master plan for strategic housing sites should involve all relevant stakeholders, including the Council, infrastructure providers, landowners, developers, the local community, service providers and other interested parties. Master plans should be developed in consultation with the Council prior to the submission of a planning application.