

# **CALDERDALE LOCAL PLAN**

## **Housing Requirement Update and Potential Supply - Representations and Responses**

### **Document - Part 3**

**Calderdale Metropolitan Borough Council**

**April 2020**





Lack of capacity in the local schools and health centre/dentist provision is also of great concern to many of the local residents. There is no evidence of increased provision of school places (para 94), or shops close to the new developments. The new developments would lead to a loss of identity in the current village community, as well as a removal of green areas for social recreation. Ironically, residents would have to take more journeys to reach an area for walking or to enjoy wildlife etc.!

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

Duty to Co-operate Reason:

I feel unable state whether the local Plan complies with the Duty to co-operate

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU550**

Site ref (if applicable): **LP0952**

Person ID: **1241732**

Name: **Mr. Cory Greidanus**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Poor Public notification and little time allowed for proper consultation. This Portal is very confusing and hugely difficult to navigate. Many people will be unable to put forward their views on the plans. Many people wont even be able to find Where to complain, because these sites in West Vale and Greetland have been listed under Elland. West Vale and Greetland are not in Elland. Section 1.2 of the Calderdale SCI 2015 calls for Clarity. -“We need to be very clear about what we are asking people and we must be sure that people understand what will happen as a result of this engagement. This includes being clear about what decisions have been made, what have not, and who will make the final decision.” This clarity does not exist, people are confused about the whole process. Disproportionate growth of 33.8% to the Greetland Community which contradicts Greenbelt policy to restrict urban sprawl. Within the Potential Sites considered and rejected report CC37, LP1028, which is also in Greenbelt, had a planned site of 122 dwellings removed. One of the reasons stated is that it would give a "disproportionate increase to Barkisland village". The increase based on the same dataset above would have been 16.6%. If Barkisland can be pulled out of its grouping with Ripponden and Rishworth then we suggest that Greetland can be distinguished from Elland. If 16.6% is disproportionate to one village why is 22.4% or even 33.8%% not disproportionate to another?

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

Sound Reason:

Main points of Objection : Flooding Risk Loss of large area of Green Belt and Wildlife Corridor Current Chronic Congestion in West Vale, and the effect on Air Quality Lack of Infrastructure Flooding Risk The risk of flooding to the Greetland and West Vale areas, as well as further downstream into Elland, are of paramount importance in my objections to development on this site. I have lived adjacent to the site in

question for the past 18 years, and can confirm that it floods regularly, and often 2 or 3 times in the same year. I am attaching photos that show some of the more severe flooding, photos taken in 2004, 2007, 2012, 2015 and 2019. As the photos show, the flooding is quite severe, and much of the proposed site is under water. This happens regularly, this is not a one-off occurrence. UPDATE: It has flooded again in 2020!!! Storm Ciara flooded the fields again on February 9, 2020. As I type this Storm Dennis approaches, the army has been called into the Calder Valley to shore up all the flood defenses that failed last week. This is getting beyond a joke. These sites are a high risk flood area, within an area highly at risk to flooding. The Environment Agency defines a high-risk flood zone as one where there is a 1 in 100 chance of flooding in any given year. This field floods far more often than that. I've attached a screen shot taken directly from the Environment Agency website, which shows the extent of flooding from surface water across the site. The photos show that this site (LP0177) is a perfect example of a flood plain at work; soaking up excess water at times of heavy rainfall, allowing space for the water to flow and be stored in times of flood, even after the river has burst its bank, and protecting land further downstream from potential flooding. The DEFRA 25 year plan states: "National flood management involves the use of a variety of measures, including tree planting, river bank restoration, building small scale woody dams, reconnecting rivers with their flood plains, and storing water temporarily on open land." Developing this floodplain area would be in direct opposition to National flood management. The exceptional floods of Boxing Day 2015 led to much damage further downstream, and eventually to the collapse of Elland Bridge. The repair bill for the bridge alone came in at £4 million, while the total economic impact to the Calderdale and Kirklees regional economy amounted to a total of approximately £170 million. (Economic Impact Assessment of the Boxing Day Floods (2015) on SMEs in the Borough of Calderdale) If the proposed scale of development along Saddleworth Road is allowed to go ahead, and these valuable flood plains are built over, then the events of 2015 will become a much more regular occurrence, leading to untold costs to the communities of West Vale, Greetland, Elland, and even further downstream. The current policy and legislation on flooding states -"due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere. And Chapter 14, paragraph 163 of the NPPF states: -" When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere" It is clearly the case that any future development of the site LP0177 would itself be under serious threat of severe and repeated flooding, and it would also put neighbouring communities in much greater danger of flooding. I believe this is a strong enough argument on its own to remove this site from the Calderdale Local Plan. Loss of large area of Green Belt and Wildlife Corridor Protecting or Wildlife Corridor and Green Belt is very important to me. Esther McVey, our current Housing Minister agreed, when she wrote in her policy on Green Belt land: "protecting the Green Belt goes beyond protection against development" Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: (i) to check the unrestricted sprawl of large built-up areas (ii) to prevent neighbouring towns merging into one another (iii) to assist in safeguarding the countryside from encroachment (iv) to preserve the setting and special character of historic towns (v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The site LP0177 as it currently exists as a Greenfield site performs strongly with this criteria. Development of this site seems to fly in the face of the NPPF information. DEFRA(Department for Environment, Food & Rural Affairs) says in their 25 year plan: "New development will happen in the right places, delivering maximum economic benefit, while taking into account the need to avoid environmental damage. We will protect ancient woodlands and grasslands, high flood risk areas and our best agricultural land." Developing site LP0177 also contradicts this. Having lived adjacent to the site for 18 years, I regularly see Herons flying past. Tawny owls and deer are regular visitors, as are bats, foxes and hedgehogs, and I have seen badgers also. The Black Brook is home to Brown Trout. The DEFRA 25 year plan also states their aim to: "Develop a Nature Recovery Network to protect and restore wildlife, and provide opportunities to re-introduce species that we have lost from our countryside" must do everything we can to protect the wildlife in this Wilderness Corridor. The Developing this site with 200 homes would destroy this precious Eco-system. "Having access

to green spaces can reduce health inequalities, improve well-being, and aid in treatment of mental illness" says the World Health Organisation. We need to be protecting this space, not developing it. Current Chronic Congestion in West Vale, Greetland and the effect on Air Quality The traffic lights in West Vale, at the junction of Saddleworth and Stainland Roads are a joke. Allowing the Co-op food store to be built right on the junction caused a bad situation to be made much worse. Huge queues extend back up Saddleworth Road (and Rochdale Road) in both directions, as well as up Stainland road every morning, and again each evening. There is simply too much traffic now for this junction to work. Add in an accident on the M62, and suddenly things get far worse again. Major plans may be in place to improve the A629 into Halifax, but these plans will do nothing to alleviate congestion through West Vale and Greetland. If the proposed developments are allowed to go ahead along Saddleworth Road, the congestion will be made much worse yet again. In fact, the WSP Parsons Brinckerhoff Report on Transport Network states that the traffic congestion at the juncture of Stainland Road-Saddleworth Road would increase by approximately 105%. So a traffic junction that is not fit for purpose, and is the bane of my life every morning and evening, (and for every other resident of Greetland, West Vale, Stainland, Elland, Barkisland, and surrounding area that needs to get through this junction every day) is going to be made 105% worse. The proposed development cannot be allowed to go ahead on this site. The effect on Air Quality that all this congestion causes is undeniable. Young children walking to school each day face walking for hundreds of yards past long queues of idling traffic waiting to get through West Vale traffic lights. Greetland Academy actually sits right on Saddleworth Road, as does Sunnybank Pre-school, often with queuing traffic right past the site. West Vale Primary School is right on Stainland Road, surrounded by queues of idling traffic. There are seven existing large companies in the immediate area with Lorries that rely on the motorway, many of which travel up and down Saddleworth road each day, adding to the congestion and the pollution. Air pollution is the biggest environmental threat to health in the UK, with between 28,000 and 36,000 deaths a year attributed to long-term exposure. There is strong evidence that air pollution causes the development of coronary heart disease, stroke, respiratory disease and lung cancer, and exacerbates asthma. This information comes from Public Health England (PHE) in a report from 11 March 2019, in which Professor Paul Cosford, Director of Health Protection and Medical Director at PHE, said: "Now is our opportunity to create a clean air generation of children, by implementing interventions in a coordinated way. By making new developments clean by design we can create a better environment for everyone, especially our children. Key interventions local authorities can take include: redesigning cities so people aren't so close to highly polluting roads." The proposed development plans along Saddleworth Road are in complete contrast to these Public Health England recommendations. They want to build new communities directly on already highly polluted and congested roads, increasing the threat to all of us. We cannot let these plans go ahead. Lack of Infrastructure Local Schools are full - both Greetland Academy and West Vale primary schools, as well as the secondary school, Brooksbank in Elland. With a proposed 600 houses, using Calderdale MBC's figure for school places of .36 per household (IDP section 9.14) this indicates another 206 places would be needed. And long term residents of Greetland would suddenly see themselves pushed out of the catchment area of their own local school, at the expense of 600 new homes built on Green Belt land surrounding the existing school. Local Dentist has a waiting list of 600 for NHS places. The nearest NHS dentist was recently found (July 2019) 11 miles away in Kirklees. The GP Surgery would be strained to take this proposed capacity. There would also be a further strain on local Hospitals. The proposed plans make no provision for extra school places, let alone Doctors and Dentists. The infrastructure needed to accommodate the size of the proposed development simply does not exist, so the proposed development must not be allowed to proceed. -----

In summary, I have outlined the 4 main reasons why I feel this Local Plan is not sound. In truth, I cannot understand why the council has even attempted to put forward this site for development, given the overwhelming evidence of regular flooding, year after year. It is totally unsuitable for that reason alone. Take into account its protected Green Belt status, the Congestion and Air Pollution it will cause, and the lack of Infrastructure to support the proposed development, and anyone can see that development on this

land is unsuitable, and therefore it should be removed from the Local Plan and preserved as Green Belt land. -----

UPDATE In response to this past weekends (09/02/2020) flooding, Councillor Jane Scullion of the Calderdale Council was quoted in the press as saying: "The Local Plan has been subject to a Flood Risk Assessment and the Environment Agency has been consulted throughout the process. The method that the Council used to identify housing sites ensured that green field sites with the potential to flood were rejected early in the process. Where only part of a site is prone to flooding, the unsuitable parts are excluded from the developable area. Surface water run-off can occur on any site; however, sustainable drainage measures will ensure that wherever possible there is an improvement to the existing situation." I can only imagine that the Council have been misinformed about this site, which doesn't just have the potential to flood, but a virtual cast-iron guarantee to flood, as my photographs show it has done in 2004, 2007, 2012, 2015, 2019, and again in 2020. It's a flood plain, doing what a flood plain is supposed to do. Putting 600 homes across these 4 sites (LP0177, LP0952, LP1625, and LP0026) would be immediately putting those 600 homes in harm's way, as well as increasing the risk of flooding to nearby residents, and to nearby communities further downstream. From the Huddersfield Examiner this week: Flooding is likely to become a regular occurrence in Calderdale - and the government needs to step in. That's the view of Calderdale Council leader Tim Swift following the devastation wreaked by Storm Ciara at the weekend, which hit 500 homes and 400 businesses, leaving infrastructure seriously damaged. And Cllr Swift warned emergencies like this were frequently affecting lives in Calderdale, financially and in terms of people's mental health. Cllr Swift told the Cabinet on Monday: "After the 2015 floods we started to move to a model of recognising this wasn't a one-off event and was about the nature of life in Calderdale and the way we have been impacted by a changing climate. It's clear this for us is a challenge that's quite different to other parts of the country. There is a potential of it being a fairly regular occurrence - we've had three major flooding incidents in less than ten years." he said. If the leader of Calderdale Council can recognize that flooding in Calderdale is going to be a fairly regular occurrence, then surely he can also recognize the folly in building 600 homes on protected Green Belt land; land that serves as a natural flood plain to help minimise the risk of flooding to our communities. This land must be protected, and removed from the Calderdale Local Plan

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

Duty to Co-operate Reason:

see above reasons.

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5606061>

Comment ID **HRU551**

Site ref (if applicable): **LP0952**

Person ID: **1241732**

Name: **Mr. Cory Greidanus**

Organisation:

Agent ID:

Name:

Organisation:

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

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when it does not increase the risk of flooding in the development's community or elsewhere. And Chapter 14, paragraph 163 of the NPPF states: -“ When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere” It is clearly the case that any future development of the site LP0952 would itself be under serious threat of severe and repeated flooding , and it would also put neighbouring communities in much greater danger of flooding. I believe this is a strong enough argument on its own to remove this site from the Calderdale Local Plan. Loss of large area of Green Belt and Wildlife Corridor Protecting or Wildlife Corridor and Green Belt is very important to me. 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the risk of flooding to our communities. This land must be protected, and removed from the Calderdale Local Plan

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

Duty to Co-operate Reason:

see above reasons.

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5606063> ; <http://calderdale-consult.objective.co.uk/file/5606062>

Comment ID **HRU560**

Site ref (if applicable): **LP0952**

Person ID: **1242981**

Name: **Mrs Pamela Watson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Most residents of Greetland are unaware of these proposals. A letter should be sent to every resident detailing the plans. Not everyone is able to access the internet or visit Calderdale offices

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

Sound Reason:

Green belt (Greenfield doesn't actually appear in national planning policy) Green Belt is put in place to protect our open spaces, to check the unrestricted sprawl of large built up areas and to assist in safeguarding the countryside from encroachment. There are many disused mills and other brown field sites available in Calderdale, the mill site in West Vale for instance, which could be used. Flooding - These areas flood extensively. Building on these flood plains will result in the water being diverted elsewhere and lead to flooding of properties elsewhere. Traffic Congestion - Have any inspectors responsible for this idea tried to travel down Saddlesworth Road or Rochdale Road into West Vale at peak times. West Vale cannot cope with the traffic now and has become a bottle neck Infrastructure - Our schools, doctors and dentists are already stretched to the limit Quality of Life - This will cause urban sprawl in Greetland taking away our countryside which is home to wildlife and fauna

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

Duty to Co-operate Reason:

As above most residents of Greetland are unaware of these proposals. A letter should be sent to every resident detailing the plans. Not everyone has access to the internet or able to visit Calderdale offices

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU576**

Site ref (if applicable): **LP0952**

Person ID: **1242415**

Name: **Mr Christopher Doyle**

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:

Objection to proposed developments LP0952 Green Belt Based on NPPF guidelines state councils should retain greenbelt to avoid unrestricted sprawl of large built-up areas and to prevent neighbouring towns merging into one another. Highways Development of sites in Greetland will worsen traffic issues in West Vale. The main problem with traffic in West Vale is the delays at the two sets of traffic lights. Due to queues at the end of Elland Bypass traffic often diverts through Elland into West Vale turning right towards Halifax. With no dedicated right turn lane or filter this causes major delays for Greetland traffic. Traffic will therefore use Saddleworth Road traffic lights and again many will turn right and cause delay and obstruction to traffic wanting to travel to Greetland, Barkisland and Ripponden. Combine this with roadworks, gas mains renewals, drainage works etc and the situation becomes carnage and gridlock. The arrangement causes delays pollution and frustration for all local commuters. Rochdale Road (B6113) and Saddleworth Road (B6114) are main arterial road connecting to Oldham Road (A672) to the west and Huddersfield Road (A629) to the East. These A roads provide access to the M62 corridor and many thousands of commuters that use the main motorway network daily. In the event of motorway closures which occur several times each year the diverted traffic completely gridlocks the secondary road network which is already full. Future developments need to be centred around public transport and rail networks to minimise the reliance upon cars for people travelling to work. When housing is situated in semi-rural areas there remains no choice but to use a car. Unless the issues are directly addressed by the council by infrastructure improvements such as localised road widening, introduction of right turn lanes, filter lights improvements at junction at end of Calderdale way (Elland Bypass) etc no further major housing developments should be planned within the area. Changing traffic light signals and linking to a control centre will not provide the necessary improvement. Allowing popular drive through burger chains to develop sites without adequate on-site land to safely service customers does not help with congestion at Salterhebble. Stationary traffic on the main road at peak feeding times results. The Site Assessment Report under the section "Potential for Cumulative Impact" simply states "M62 J24" but the complete absence of any reference to the Ainley Top roundabout and current issues at the Motorway Junction and the feeder roads. This shows a complete lack of appreciation of the real local issues. Mitigation that the M62 junctions 20 to 25 are due to be upgraded to smart motorway by 20/21 will not improve issues in West Vale, Salterhebble or Ainley top. The issues at ainley top will only be made worse by introduction of new housing with the inevitable additional commuters to Leeds and other centres of employment. There are queues every day from the main ainley top roundabout trailing back onto the M62 caused by commuters returning home and congestion at ainley top. These trail back down the motorway often for more than a mile. This results in an extremely dangerous motorway with frequent accidents involving cars and wagons an

inevitable injuries and fatalities. Further development will only increase the issue. It also results in misery and delays for commuters and pollution. With persistent roadworks for services, maintenance, changes for developments etc, etc. These are never considered and yet they occur on a regular basis. Ainley Top roundabout and all the feeder roads that will take the additional load and this appears to have been totally ignored. Motorway improvements can therefore not be classed as mitigations. Weekdays between the hours of 6.30am to 9.30am, 11.30am to 1.30pm and 3.30pm to 7.00pm, and for long periods throughout both Saturday and Sunday, massive volumes coming from all directions into the Ainley Top roundabout, with long lines of traffic in every direction. Open Space The outcome of this section of the report is stated as -"No Loss/No Impact" Development on this site, combined with plans for development of the field opposite (LP0021) would mean total loss of the current open space! The report also states, "If the site is designated for housing, open space would be required as part of any development", and the council's answer to this has been to remove a tiny section of the field from the housing plans. Housing Services The Site Assessment report states "subject to the Green Belt Review the site "appears suitable for Housing, yet the Green Belt review produced a high score of 4/5 and has still been included for development. The Greenbelt report confirms that development at the site would lead to a -"high potential for urban sprawl" and -"coalescence of towns" In addition, it also states the site -"performs an important role in safeguarding the countryside from encroachment" Environmental Health The area already suffers from considerable traffic noise and the volume of traffic, along with the constant queues of traffic with engines running, mean higher than normal levels of Nitrogen Dioxide already exist. Despite this the plans are to add even more traffic, and some of the new houses could literally be within a few metres from a road that for many hours of every day is subject to standing traffic. How can this possibly make sense in terms of health? Flooding Development on the flood plain is not viable or sustainable. Additional surface run off will inevitably result from tarmac access roads and housing development. Green roofs, permeable driveways, soakaways within gardens may all be put forward as mitigation but there will still be a negative impact upon the runoff into the local streams and watercourses which flow down the valley into the river calder via West Vale. On route there are culverts below roads and rivers flowing through arches below highways that will be affected by the additional water flow and surcharge. Flood plains are already minimising and slowing down the impact upon West Vale. The volumes of water feeding down into West Vale are unprecedented and if any worse flooding of West Vale will occur. Water courses/culverts can easily become blocked and surcharged with debris from upstream. There is already flooding below the railway bridge on Stainland road and within Heath Rugby Club. Calderdale MBC should not require reminding that Elland Bridge and the former Toll bridge at Copley were both washed away in recent years and took years to reconstruct. Which major part of our infrastructure will be washed away next? Brow Bridge, Culverts below Saddleworth Road, River bridges supporting Stainland Road, Elland Bridge main span etc, etc. Development always results in affects downstream.

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

Duty to Co-operate Reason:

Suggested Modifications:

Brownfield sites should be developed first and sites with better infrastructure links. Avoid development upon flood planes

Comments:

Additional Evidence Link:

Comment ID **HRU582**

Site ref (if applicable): **LP0952**

Person ID: **1121012**

Name: **Mr James Sinclair**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Please read this section of the Consultation Portal in conjunction with the comments I have made in the other two sections as many comments are relevant to all sections available on the Consultation Portal. Also note that these comments apply equally across applications LP0026, LP0177, LP0952 and LP1625, as taken together they represent a clear and present danger to the health and vitality of the West Vale/Greetland community. The Local Plan does not address the implications of the National Planning Policy Framework, especially, NPPF Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. Site assessments for the 4 proposed development sites in Greetland are overwhelmingly uncertain or negative: LP0026 ; 10 Uncertain Assessments and 1 Negative Assessments. LP0177 ; 9 Uncertain Assessments and 4 Negative Assessments. This site was also refused planning permission in July 2019. LP0952 ; 11 Uncertain Assessments and 2 Negative Assessments LP1625 ; No sustainability assessments! It is inconceivable that given the above, development should be permitted and even more unbelievable that local councillors should support the adoption of the plan! According to the NPPF Para 143 under 'Proposals affecting the Green Belt' it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' Those very special circumstances simply do not exist and all other more appropriate sites should be included in the Plan before Green Belt sites such as this one. There are no justifiable exceptional circumstances for change of use of this area of Greenbelt land. Although Calderdale Council do recognize some (but by no means all) elements harmful to the Green Belt in their plan, they offer only feeble mitigation against that harm. Calderdale Council need to demonstrate that the Local Plan will enhance those areas where development is proposed and that the development will not negatively affect the existing local communities and the environment in which they live. They have singularly failed to do this. I feel that these plans have not been properly considered and I strongly believe that they will negatively impact upon the environment and the quality of life in the community for years to come.

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

Sound Reason:

Please read this section of the Consultation Portal in conjunction with the comments I have made in the other two sections as many comments are relevant to all sections available on the Consultation Portal. Calderdale Council is basing its estimate of the future need for houses on out-dated information. As we are no longer members of the EU it should revisit those estimates. It is clearly uncertain that the overall requirement for housing will be as great as stated. In reference to this site reference number, LP1625, and sites LP0177, LP0026, and LP0952, there are a number of issues which apply as a result of the scale of proposed development in the Greetland area. There is a grossly disproportionate emphasis that the Plan has upon some communities, particularly Greetland, which are accommodating far in excess of a fair, reasonable and balanced share of development given their relative size. The resulting 'Urban Sprawl' that this plan would create in the Greetland area will have many negative consequences for residents and the environment, such as increased water, air and noise pollution, increased traffic fatalities and congestion, and increased car dependency. The traffic congestion issues, already evident on Saddleworth Road and Stainland Road, do not appear to get any significant recognition in the plan. West Vale is currently at breaking point with the amount of traffic which passes through on a daily basis. West Vale is a vital access

route for the valley and surrounding towns and villages and with additional vehicles, a natural bi-product of development, would become dangerously congested. There is no obvious solution to ease the pressures of traffic on West Vale and despite attempts in process of improving the A629 junction, Saddleworth Road and Rochdale Road junctions, it is highly likely that a possible additional 1200 vehicle movements (assuming a 2 car family per household) at peak periods will result in increased congestion and attendant pollution in West vale and surrounding roads. It has also not escaped notice that the proposed modifications to the A629 will result in an additional junction for commuters from West Vale into Halifax to navigate, potentially resulting in even further congestion back into West Vale. WSP Parsons Brinckerhoff Report on Transport Network states that: "Ç This report identifies that traffic congestion at the junction of Stainland Road-Saddleworth Road would increase by approximately 105% "Ç This report also identifies that traffic congestion at the juncture of Stainland Road-Rochdale Road would increase by over 100% The potential increase in car journeys in the area will undoubtedly contribute to increased air pollution, particularly effecting vulnerable young children walking to and attending the local school at the side of Saddleworth Road. The existing infrastructure barely meets the needs of the current population of Greetland so increased capacity of schools, dentists, and GP surgeries would be needed to service such a significant increase in the local population. There appear to be no mitigating factors to compensate for the increase of 600 properties in the area. At an average of 4.4 people per property, the population increase of 2640 represents a 25% increase in the potential number of patients eligible for treatment in the local Medical Centre, a service which struggles to cope today. The development of thesesites would be against all five functions of Green Belt and, most decisively, would mean the coalescence of Greetland and West Vale and the deterioration of the identity of both places, thus undermining the Council's Settlement Hierarchy. This area of Greetland has an abundance of wildlife due to the natural and undisturbed environment. The valley is home toan extremely healthy and diverse fauna, including heron,kingfishers, dippers, nut hatches, kestrels, owls, pheasant, woodpecker, bats, fox and deer with trout in the brook itself. Development along the riparian habitat would have a severe impact on a number of species who are reliant upon the Eco system which currently exists here. There are also ecological constraints with regards to Black Brook as it is a UK Biodiversity Action Plan Priority Habitat. In addition,the Woodland Trust has recently supportedan applicationforthe donation of over 100 indigenous trees specifically recommended forthis area. There are many natural springs on the hillsides above Black Brook which run down through sites LP0026, LP0952, and LP1625, and site LP0177 (a high-risk flood area) is partly situated on a natural flood plain. Anydevelopment on these sites, which act as a natural and essential soak away, would add to the run-off of rain and spring waterandwould exacerbate potential flood damage further down the valley, into West Vale and beyond. The impact of Storms Ciara and Dennis over the week of 9 th -16 th February 2020 should provide a salutary reminder to Council planners of the danger of continuing housing development on flood plains and associated drainage slopes. To comply with current legislation on flooding these sites should be removed from the plan. Large open spaces are needed for the mental and physical health and well being of all. Urban sprawl has many negative consequences for residents and the environment. The wooded valley walkway along the side of Black Brook provides a popular area for many of the local residents to enjoy leisure activities (walking, running, cycling etc.) away from the rigors of everyday life and free from traffic and air and noise pollution, yet within walking distance of existing communities. This is an invaluable asset to the community and must be safeguarded from any future development.

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

Duty to Co-operate Reason:

Please read this section of the Consultation Portal in conjunction with the comments I have made in the other two sections as many comments are relevant to all sections available on the Consultation Portal. I have significant concerns about the way in which the process of producing the Local Plan has been conducted. I believe that Calderdale Council should have made more of an effort to communicate the

process of the Local Plan to residents and raise awareness of the consultation. I also think that Calderdale Council have produced a website which is not fit for purpose. It is far too difficult and time-consuming process for people to respond to the proposals online, a point which may significantly reduce the number of objections and comments about the plan.

**Suggested Modifications:**

That the 4 sites in Greetland (LP0026, LP0177, LP0952, and LP1625) be removed from the plan.

**Comments:**

**Additional Evidence Link:**

Comment ID **HRU586**

Site ref (if applicable): **LP0952**

Person ID: **1128407**

Name: **Mrs Patricia Sinclair**

Organisation:

Agent ID:

Name:

Organisation:

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

**Legal Compliance Reason:**

Please read this section of the Consultation Portal in conjunction with the comments I have made in the other two sections as many comments are relevant to all sections available on the Consultation Portal. Also note that these comments apply equally across applications LP0026, LP0177, LP0952 and LP1625, as taken together they represent a clear and present danger to the health and vitality of the West Vale/Greetland community. The Local Plan does not address the implications of the National Planning Policy Framework, especially, NPPF Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. Site assessments for the 4 proposed development sites in Greetland are overwhelmingly uncertain or negative: LP0026 ; 10 Uncertain Assessments and 1 Negative Assessments. LP0177 ; 9 Uncertain Assessments and 4 Negative Assessments. This site was also refused planning permission in July 2019. LP0952 ; 11 Uncertain Assessments and 2 Negative Assessments LP1625 ; No sustainability assessments! It is inconceivable that given the above, development should be permitted and even more unbelievable that local councillors should support the adoption of the plan! According to the NPPF Para 143 under 'Proposals affecting the Green Belt' it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' Those very special circumstances simply do not exist and all other more appropriate sites should be included in the Plan before Green Belt sites such as this one. There are no justifiable exceptional circumstances for change of use of this area of Greenbelt land. Although Calderdale Council do recognize some (but by no means all) elements harmful to the Green Belt in their plan, they offer only feeble mitigation against that harm. Calderdale Council need to demonstrate that the Local Plan will enhance those areas where development is proposed and that the development will not negatively affect the existing local communities and the environment in which they live. They have singularly failed to do this. I feel that these plans have not been properly considered and I strongly believe that they will negatively impact upon the environment and the quality of life in the community for years to come.

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

**Sound Reason:**

Please read this section of the Consultation Portal in conjunction with the comments I have made in the

other two sections as many comments are relevant to all sections available on the Consultation Portal. Calderdale Council is basing its estimate of the future need for houses on out-dated information. As we are no longer members of the EU it should revisit those estimates. It is clearly uncertain that the overall requirement for housing will be as great as stated. In reference to this site reference number, LP1625, and sites LP0177, LP0026, and LP0952, there are a number of issues which apply as a result of the scale of proposed development in the Greetland area. There is a grossly disproportionate emphasis that the Plan has upon some communities, particularly Greetland, which are accommodating far in excess of a fair, reasonable and balanced share of development given their relative size. The resulting 'Urban Sprawl' that this plan would create in the Greetland area will have many negative consequences for residents and the environment, such as increased water, air and noise pollution, increased traffic fatalities and congestion, and increased car dependency. The traffic congestion issues, already evident on Saddleworth Road and Stainland Road, do not appear to get any significant recognition in the plan. West Vale is currently at breaking point with the amount of traffic which passes through on a daily basis. West Vale is a vital access route for the valley and surrounding towns and villages and with additional vehicles, a natural bi-product of development, would become dangerously congested. There is no obvious solution to ease the pressures of traffic on West Vale and despite attempts in process of improving the A629 junction, Saddleworth Road and Rochdale Road junctions, it is highly likely that a possible additional 1200 vehicle movements (assuming a 2 car family per household) at peak periods will result in increased congestion and attendant pollution in West vale and surrounding roads. It has also not escaped notice that the proposed modifications to the A629 will result in an additional junction for commuters from West Vale into Halifax to navigate, potentially resulting in even further congestion back into West Vale. 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At an average of 4.4 people per property, the population increase of 2640 represents a 25% increase in the potential number of patients eligible for treatment in the local Medical Centre, a service which struggles to cope today. The development of thesesites would be against all five functions of Green Belt and, most decisively, would mean the coalescence of Greetland and West Vale and the deterioration of the identity of both places, thus undermining the Council's Settlement Hierarchy. This area of Greetland has an abundance of wildlife due to the natural and undisturbed environment. The valley is home toan extremely healthy and diverse fauna, including heron,kingfishers, dippers, nut hatches, kestrels, owls, pheasant, woodpecker, bats, fox and deer with trout in the brook itself. Development along the riparian habitat would have a severe impact on a number of species who are reliant upon the Eco system which currently exists here. There are also ecological constraints with regards to Black Brook as it is a UK Biodiversity Action Plan Priority Habitat. In addition,the Woodland Trust has recently supportedan applicationforthe donation of over 100 indigenous trees specifically recommended forthis area. There are many natural springs on the hillsides above Black Brook which run down through sites LP0026, LP0952, and LP1625, and site LP0177 (a high-risk flood area) is partly situated on a natural flood plain. Anydevelopment on these sites, which act as a natural and essential soak away, would add to the run-off of rain and spring waterandwould exacerbate potential flood damage further down the valley, into West Vale and beyond. The impact of Storms Ciara and Dennis over the week of 9 th -16 th February 2020 should provide a salutary reminder to Council planners of the danger of continuing housing development on flood plains and associated drainage slopes. To comply with current legislation on flooding these sites should be removed from the plan. Large open spaces are needed for the mental and physical health and well being of all. Urban sprawl has many negative consequences for residents and the



environment. The wooded valley walkway along the side of Black Brook provides a popular area for many of the local residents to enjoy leisure activities (walking, running, cycling etc.) away from the rigors of everyday life and free from traffic and air and noise pollution, yet within walking distance of existing communities. This is an invaluable asset to the community and must be safeguarded from any future development.

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

Duty to Co-operate Reason:

Please read this section of the Consultation Portal in conjunction with the comments I have made in the other two sections as many comments are relevant to all sections available on the Consultation Portal. I have significant concerns about the way in which the process of producing the Local Plan has been conducted. I believe that Calderdale Council should have made more of an effort to communicate the process of the Local Plan to residents and raise awareness of the consultation. I also think that Calderdale Council have produced a website which is not fit for purpose. It is a far too difficult and time-consuming process for people to respond to the proposals online, a point which may significantly reduce the number of objections and comments about the plan.

Suggested Modifications:

That the 4 sites in Greetland (LP0026, LP0177, LP0952, and LP1625) be removed from the plan.

Comments:

Additional Evidence Link:

Comment ID **HRU599**

Site ref (if applicable): **LP0952**

Person ID: **1243001**      Name: **MR David Farrar**      Organisation:

Agent ID:      Name:      Organisation:

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

Legal Compliance Reason:

See comment below

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

Sound Reason:

I object to the Local Plan Site Ref LP0177, LP0952, LP1625, LP0026 for the following reasons: Loss of highly Sensitive Green Belt Increased Traffic Congestion Increased Air pollution Increased Flooding to sewers and rivers Loss of -"Highly Sensitive Green Belt" NPPF Section 13 Protecting Green Belt Land Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: 1) to check the unrestricted sprawl of large built-up areas (2) to prevent neighbouring towns merging into one another (3) to assist in safeguarding the countryside from encroachment (4) to preserve the setting and special character of historic towns (5) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Calderdale Council, in its own evidence, concludes that this area of Green Belt performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt. Esther

McVey's (former Housing Minister up to Nov 2019) written policy on Green Belt land quotes:: "protecting the Green Belt goes beyond protection against development" – "My department is working with DEFRA (Department of Environment, Food & Rural Affairs) and Natural England on the once-in-a-generation Environment Bill which will establish a comprehensive legal framework for environmental improvement and make net gains for biodiversity mandatory for new development. Of course one of the most important environmental safeguards we have is the Green Belt. And I want to be clear that our commitment to this is as strong as ever, with any changes only happening in exceptional circumstances ; protecting the Green Belt goes beyond protection against development"

Exceptional circumstances in The Government White Paper - "Fixing our Broken Housing Market" Parag 1.39 states that: - "The Government wants to retain the high bar to ensure the Green Belt remains protected, but we also wish to be transparent about what this means in practice so that local communities can hold their councils to account therefore we propose to amend and add to the National Policy to make it clear that: authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including making effective use of suitable brownfield sites and the opportunities offered by state regeneration: Do Calderdale Council have the evidence that they have done this? Brownfield sites have been removed from the plan because developers do not want to develop these sites as their profits are not as high. This is not a good reason for destroying highly sensitive green belt and does not constitute exceptional circumstances. There are brownfield sites within Calderdale that could be developed to provide the necessary housing demand and should be developed first before destroying green belt for ever. Changes to Economic Relationships The Local Plan was drawn up between 2016 and 2018, with amendments made in October 2019. The plan was based on housing requirement to support the economic growth plan. This country has just seen its biggest change in 47 years as we have now left the EU. The housing projection used in the Local Plan must no longer be valid due to the significant change in UK's relationship with the EU. Reduced immigration will lead to a reduction in the amount of new housing required and therefore reduce the need to release Green Belt. It must be reviewed prior to acceptance of the plan as the housing need will be significantly smaller post Brexit. Increased Traffic Congestion Saddleworth Road\Stainland Road Junction. The 4 sites proposed on Saddleworth Road will more than double the number of vehicles coming down Saddleworth Road. There has been chronic congestion at the 2 traffic light junctions in nearby West Vale for a number of years now. This crossroad junction carries traffic from Greetland, Barkisland and Ripponden, traffic to and from Elland and Junction 24 of the M62, and all traffic travelling between Halifax and the villages beyond the Outlane area of Huddersfield and Junction 23 of the M62. This junction is dangerous and congested throughout the day, especially since a Cooperative store was sited in the middle of the Saddleworth Road/Stainland Road traffic light junction about 4 years ago. Vehicles including buses and trucks fight over the space at both junctions in West Vale and often selfishly push their way through when the lights are red, in turn putting other road users and pedestrians at risk of harm. The flow of slow moving vehicles is constant and air pollution here has increased as a consequence. It has been stated that this can be resolved by changing the setting on the traffic lights, but this cannot ease the congestion if additional capacity is not provided on the roads out of the junction towards Elland or Halifax. The multimillion pound works at Salterhebble will only make the congestion worse in West Vale as it makes the queueing area between Salterhebble mini roundabout and West Vale smaller, therefore the traffic will back up into the West Vale traffic lights area making the situation worse. The local roads are incapable of taking any additional traffic. Calderdale Council are proposing to allow 600 plus properties to be built on Saddleworth Road thus adding to the chronic issues which already exist. Increased Air Pollution The primary goal of the Clean Air Act is, - "to achieve national ambient air quality levels protective of public health and welfare by establishing air quality standards and imposing limitations on air pollutant emissions from both stationary and mobile sources" The doubling of the number of vehicles (due to the proposed housing developments) using and sitting in traffic queues on the lower part of Saddleworth Road will impact negatively on the air quality in the area. There is an infant school and pre school located between 2 of the proposed large housing sites on Saddleworth Road. Traffic around the school is already a major safety issue and the road around the school is a bottleneck twice a

day. Increased emissions from the standing traffic will affect the children and families using the school and those living near the school. Air quality standards will be compromised. The centre of West Vale probably has poor air quality already. Let's not add to it for the sake of our health. Clean air is crucial for our health and well being, and Greetland is a community continually trying to create a better and healthier environment for the benefit of everyone. Money has been obtained from the Woodland Trust and a large number of trees have already been planted in the area and more are planned. This is being undertaken in order to maintain good air quality and to help preserve the habitat for the wildlife corridor here. Massive house building in the area will negate these actions. Flooding Immediate Area On the last Local Plan these sites were graded as a Class 1 Severe Risk Flood Area and were removed; in compliance with current legislation they should not have been put back into the amended Local Plan in October 2019. The area to the rear of Woodfield Drive next to the brook, part of the development site LP0177, flooded very badly on Boxing Day 2015 and again 8th/9th February 2020 and again 14th/15th February . Residents have already posted images of the flooding in this Portal for reference. The current planned development in along Saddleworth Road will increase greatly the peak flows and volumes runoff from the fields and therefore the risk of flooding. Developers use Sustainable Urban Drainage techniques to slow this flow down, but the clay soil in this area make this technique unsuitable. The alternative is large storage areas either above or below ground. These techniques will reduce peak flows and slow the flows down but they do not reduced the volume of runoff that will be more than double the greenfield runoff, thus making the flooding to the rivers worse in the immediate vicinity and West Vale. Current policy and legislation on flooding states "due to every increasing wide-scale flooding incidents in the country and the ever increasing threat of climate change new development in a flood area that increases the risk of flooding in the development's community or elsewhere is not permitted". Calderdale Council Planning Department has a duty of care to comply with current policy and legislation on flooding. Housing should not be built on sites such as this. Wider Catchment Issues The Black Brook flows through West Vale and discharges into the river Calder in Elland. In 2015 and 2020 major flooding has occurred on the River Calder at Todmorden, Hebden Bridge, Mytholmroyd, Sowerby Bridge, West Vale, Elland and Brighouse. The proposed development along Saddleworth Road as stated above will double the volume of water into the black brook further increasing the risk of flooding at very sensitive flood site downstream in Elland and Brighouse. If the land is no longer needed for farming, it would be better used to contribute to reducing the wider catchment flooding issues by planting trees which will reduce runoff and also enhance the wildlife corridor. Sewer Flooding The sewers that runs close in the Black Brook and down Saddleworth Road are already overloaded with combined sewer overflows (CSO) that discharge excess flows into the brook at time of rainfall. The proposed developments will more than double the number of houses connected to these sewer systems. These additional foul flows will almost double the flood volumes on the sewers and and nearly double the annual spill volumes from the CSOs which will increase the pollution to the brook. This will have a negative impact on the fish and wildlife in the area. The Environment Agency have a no deterioration policy for CSOs but there are currently no plans to upgrade the sewer system in Greetland and West Vale to negate this impact.

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

Duty to Co-operate Reason:

There are significant concerns about the way in which the Local Plan has been formulated and worries too about the involvement and influence of major developers on the selection of suitable sites. I feel that Calderdale Council should have made a better effort to communicate the process of the Local Plan to residents and done more to raise awareness of the consultation. I also think that Calderdale Council's website is a maze of screens, reports, and links, that are very difficult to navigate through and to fully understand. Their user guidelines are minimal and provide no real help in getting you to the right place to make a comment. It is a far too difficult and time consuming process for people to respond to the proposals online, a point which may significantly reduce the number of objections and comments about the plan.

#### Suggested Modifications:

That the 4 sites in the Greetland area (LP0026, LP0952, LP0177, and LP1625) be removed from the plan.

#### Comments:

#### Additional Evidence Link:

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Comment ID **HRU605**

Site ref (if applicable): **LP0952**

Person ID: **1243009**

Name: **Mr Martin Worsick**

Organisation:

Agent ID:

Name:

Organisation:

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

#### Legal Compliance Reason:

This plot is shown as being Green Belt land and readily meets 3 of the 5 main criteria for Green Belt land. In the site assessment report it is identified as Greenfield. This land has been Green Belt land for some time now and as such building restrictions apply. This plot is a flood plain area and has indeed been severely flooded within the last week. Government guidelines NPPF suggest that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas of higher risk whether existing or future.

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

#### Sound Reason:

Green open spaces are very important to our health and well being and we have chosen to live in a rural area exactly for those reasons. Urban sprawl is in danger of encroaching on our local green spaces and removing precious green belt land and corridors which host a wide variety of flora and fauna. We have seen deer, pheasants, owls, bats, and a wide variety of birds. Black Brook has brown trout and possibly even otters. In Calderdale's own Sustainability Appraisal in 2018 the sites were recognised as being grade 3 agricultural land and as being a valuable commodity for the future especially due to climate change. As mentioned above there is a serious risk of flooding which would only be exacerbated by any housing built on the fields identified in sites LP0026, LP0177, LP1625, and LP0952 which would remove valuable soak away areas. There is a grade 2 listed farm house building yards to the south of this site. Site LP0177 has recently been refused planning permission (5th July 2019). Again looking at the 4 proposed sites mentioned above, and the high number of proposed houses (600) at the side of Saddleworth Road there would be a massively significant increase in traffic on this road leading to even more issues at the already congested junctions of Saddleworth Road and Stainland Road and Stainland Road and Rochdale Road in West Vale. The early morning and school time traffic queues stack back almost to the school on Saddleworth Road at the moment so additional traffic would undoubtedly increase air and noise pollution particularly in the area around the school where especially vulnerable young children walk to school. Rat runs may also be created between the main arterial routes as drivers seek to avoid the worst congestion. The local infrastructure is already stretched with schools, doctors, and dentists in the area struggling to meet the needs of the local community. This is an area with a high car ownership and public transport in the area is poor and infrequent with only limited services to serve the community.

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

Duty to Co-operate Reason:

Calderdale Council have not done enough to communicate this plan, and the method and deadlines for commenting on the plan. They have obviously tried to limit the number of people objecting to the plan. The website provided for making comments and objections is over complicated and very very difficult to access and navigate and the guidance notes are insufficient for all but the most computer literate. There are significant concerns about the way in which the Local Plan has been formulated and worries too about the involvement and influence of major developers on the selection of suitable sites.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU610**

Site ref (if applicable): **LP0952**

Person ID: **1242514**

Name: **MRS Christine Beaumont**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I would like to object to the proposed local plan for Greetland. First of all point out that Greetland is in Halifax and not Elland (my address Greetland, Halifax, West Yorkshire NOT Greetland, Elland, Calderdale). I have been a resident in the village of Greetland for over 35 years. Within these years I have seen several housing developments built. First of all the Goldfield Estate. A very large housing development. This was built on an area of green space and took away a play area for children and recreational use for adults. It also took away a natural habitat for wildlife. The 2nd estate to be built was the Bankfield Estate. Again another large estate. Which took away a play and recreational area and also wildlife habitat. One of those being a very large pond fed by local springs where newts, frogs and dragon flies could be found. It was a regular place for families to visit. In addition to these there have been several smaller developments. The developments over the last 35 years has resulted in the village doubling in size. The school, which only had one class per year when my own children attended, now has 2 classes per school year. I understand the capacity of the school is 420 and the school is FULL. Objection Flooding - 2015 & 2020 The Greenbelt land proposed for building is prone to flooding. In 2015 there was significant flooding to the fields in question. Prior to this date there were defined paths from West Vale, along Black Brook, to Gate Head Lane. After the floods these disappeared. The ground fractured in some of the areas. The water was contained by these fields. As far as I am aware, there wasn't any damage to properties in the surrounding area. However, further down the valley, towards Elland, buildings, a bridge and other properties sustained significant damage. The bridge collapsed. Where is the water to go if the fields are built on? Will the properties in lower Greetland/West Vale be the next area to experience flooding? Are they going to suffer in the same way as those in Hebden Bridge? Since writing this, there has been further significant flooding to the area. On 8th and 9th February 2020 the land on all of the local plans for Greetland was flooded. Several images/videos can be found on the Greetland Pressure Group facebook page. In addition to these areas significant flooding occurred on Stainland Road, the fields off Stainland Road, Elland, Brighouse and the Calder Valley. Stainland Road travels through West Vale (lower Greetland). Infrastructure - Education, Health, Highways. Highways If the building work was allowed to be carried out there would be noise, dust, mud. Constant and increased traffic on both Saddleworth Road and Rochdale Road. Vehicles (trying to

avoid building contractors and queues on Saddleworth Road) taking the narrow roads up to Rochdale Road to enable them to take that road into West Vale. The roads in this area cannot cope with any increase in traffic. A journey down to West Vale (on both roads) at peak time in a morning can take up to 25 minutes at the moment. This journey time will increase considerably if the number of dwellings proposed were to be allowed. As a result of standing traffic there would be a significant increase in air pollution. It is obvious even now when you walk down the hill from Greetland to West Vale. Air pollution is particularly bad in West Vale at peak times. This is only going to get worse with the extra vehicles both from the new estates and the building contractors. Saddleworth Road or Rochdale Road have to be taken if you intend to travel in the direction of Halifax or Huddersfield or join the M62. There is no alternative. All roads lead to West Vale and no recalibration of the traffic light timing sequence at the junctions will ease the present congestion or future increased traffic. The routes our children take to walk between their respective schools are the same ones that will attract the increased traffic and resultant air pollution. What effect will this air pollution have on our community's health? The effect this would have on our children (and adults) would be catastrophic. (increase in respiratory problems?) This is an area where, at the moment, you can still leave your car at home and walk. Surely the health of our community should be our priority. Don't take our countryside away. We need it. Our future generations need it! Infrastructure - Schools The Greetland School is sited on Saddleworth Road and School Street (off Rochdale Road). Greetland School is run over 2 sites. Years 1 & 2 at the Sunnybank Annex. The Sunnybank Annex and pre-school, are in the area where one the largest of the proposed dwellings on the local plan are to be built (LP0177 - 200 houses). The construction of this development, and the others higher up Saddleworth Road, will result in increased air pollution, noise, dirt etc which can only have a detrimental effect on everyone's health. The previous developments resulted in the local schools having to significantly increase class sizes and the number of classes. As the schools are at capacity now, how are they expected to accommodate the children of new families to the area? What effect will it have on existing families being able to get their children into their local school? There would be an increase in traffic at school drop off and pick up times. This is already an issue. Any increase in traffic would only serve to put lives at risk. For a child, walking to school is part of growing up. It is a way of socialising, exercising, learning to deal with traffic, gaining independence etc. Let's make it safe. Infrastructure - Health Additional housing in the area would need our local GP surgeries and dental practices to be expanded. Already there is a shortage of doctors and NHS dentists and this has been the case for some time. This is not going to change. These services are a necessity of life and therefore the lack of them cannot be ignored. This week we have seen the closure of 5 surgeries in Calderdale and patients placed with other, existing, GP surgeries. This extra burden on GP'S cannot continue. We will end up losing General Practice Doctors not attracting them to the area. Extract from the Halifax Courier 21.1.2020. "The Sowerby Bridge, Ovenden and Elland, sites currently operated by Virgin Care LLP (Meadow Dale Group Practice) will close and the CCG will register patients with an alternative practice". Children (and adults) need exercise. Need to be outside in the fresh air. Need to socialise outside of the home. Extract from the minutes taken at the meeting of the Calderdale Health and Wellbeing Board dated 8th August 2019. "There were a number of recent examples of work within the community which had provided benefits for residents of Calderdale. Examples were provided by Officers in regards to 'harnessing the power of communities', one which involved a walk in the hills with young people, who experienced a different kind of engagement to get away from the notion of the same kinds of activity relating to exercise (e.g. gym, swimming etc.), which positively impacted their health as well as their mental health and emotional wellbeing". How can Calderdale, and the Government agencies, propose building on Greenbelt land and removing what they obviously see as a benefit to their communities health, mental health and emotional wellbeing. Extract from News Centre - Latest News from Calderdale Council(<http://news.calderdale.gov.uk/helping-young-children-to-stay-active>) Posted 27.9.2019. Gemma Mann, Children's Health and Wellbeing Lead at Public Health England, said: -"It's really important that all children get the necessary daily physical activity they need to stay healthy, the benefits for children are well evidenced. Moving more helps young children to develop motor skills, improves cognitive development, helps them maintain a healthy weight, enhances bone and muscular development and

supports the learning of social skills." Cllr Faisal Shoukat, Calderdale Council's Cabinet Member for Public Health and Cohesion, said: -"We want all children in Calderdale to have the best start in life. An important part of this is to be physically active from an early age". Don't take our countryside away. We need it. Our future generations need it! Ecology I have reviewed the comments made by Mr Mark Jones of David Wilson Homes. Please explain how reducing a 10HA area of naturally occurring greenbelt/wildlife corridor down to 3.38HA of man-made wildlife corridor can produce "an enhanced biodiversity/recreation corridor". Surely, the greenbelt land as it is, currently sustains a greater and more diverse naturally occurring ecological system than any man-made corridor could ever create. I've also noted Mr Jones comments on the expansion of the school. Another building contract for them! Once again, the big contractors, government and local councils, are attempting to take away school playing fields. Consequently the loss of Physical Education facilities and recreational spaces can only result in even more unhealthy children. How does that sit with "The Councils health and anti-obesity campaign?". I would also question whether Mr Mark Jones ever visited the area in compiling his report. I would also refer to the Housing Minister Esther McVey's speech on the updated National Planning Policy Framework: setting out the government's planning policies for England and how they should be applied. (16.10.2019 published 16.1.2020). "Protecting the environment for future generations" "The revised NPPF also takes a long view; recognising the role that smart planning and good design plays to not just protect, but enhance, our environment and tackle climate change. As such, it asks local authorities to seek net gains for biodiversity when granting planning permissions. It encourages the provision of green infrastructure, recognises the important status of Local Wildlife Sites, ancient and veteran trees and woodland and prevents unacceptable development in National Parks and Areas of Outstanding National Beauty. But we know we have to do more. Which is why my department is working with Defra (Department for Environment, Food & Rural Affairs) and Natural England on the once-in-a-generation Environment Bill which will establish a comprehensive legal framework for environmental improvement and make net gains for biodiversity mandatory for new development. Of course, one of the important environmental safeguards we have is the Green Belt. And I want to be clear that our commitment to this is as strong as ever, with any changes only happening in exceptional circumstances - and, even then, development only being able to go ahead with improvements to access and environmental quality in the remaining Green Belt. Protecting the Green Belt goes beyond protection against development" There is no improvement to access or environmental quality in the remaining Greenbelt. By proceeding with the developments proposed for the Greetland area you are removing a substantial amount of our Greenbelt. As such you are failing to comply with the government ministers instructions. Extract from the Independent 5.12.2019 17.08 pm <https://www.independent.co.uk/news/uk/politics/boris-johnson-housing-build-construction-flood-plains-derbyshire-election-a9234456.html> Boris Johnson has thrown housebuilding plans into confusion, by suddenly calling for an end to construction on flood plains. Around 9 per cent of new homes in England are built on land where there is a -"high probability" of flooding "" and a recent investigation found that 10,000 are currently in the pipeline. But, on the campaign trail in flood-hit Derbyshire, the prime minister said: -"We've got to stop building on flood plains. We've got to stop building on areas which are vulnerable to flooding." And we now turn to Calderdale Authority. The following link is to a survey sent out by Calderdale Council to the local community. The survey was received on Thursday 6th February, 2020, just before the extensive flooding that occurred on 8th and 9th February 2020. This survey refers to the Climate Emergency. <https://www.calderdale.gov.uk/survey/climate-emergency-2020/?id=fmB2n> Extracts from the survey: " Pollution from fossil fuel vehicles causes asthma in our towns, and worsens the health of those with heart or lung problems. Traffic noise is a nuisance for many communities, and fast moving vehicles pose dangers - especially for children. Many people sit down in their car to drive to work and then spend all day sat in an office. This physical inactivity is bad for our health". Land and Biodiversity "Biodiversity is at severe threat from climate change such as a loss of species and habitats. Land use may need to change drastically in the future to meet climate change targets before the damaging effects are irreversible. Going back in history, much of the UK's land mass was covered in trees. There were also huge areas of bog and marsh. People used the trees as a natural resource as a fuel and to build ships. Bogs and

marshes were drained for food production. From a climate change perspective Calderdale alongside the rest of the South Pennine landscape was subjected to 200 years of the worst atmospheric pollution the UK has ever seen from past industrial activity. This has decimated the uplands of Calderdale to a carbon source from degraded peatland, with poor fire resilience, declining biodiversity and reacting rapidly to flooding. It is possible to turn this around, restoring the blanket bog to a condition which is a real benefit to all of us. The uplands of Calderdale also have a lower than average tree cover following historic land management practices. People who live in Calderdale today are very used to seeing fields and open spaces, grazing animals and pastures - land which has been designed by and is managed for the benefit of humans. Declining bee populations have become a well understood symbol of the impact of intensive agriculture. Additionally, a whole host of birds, insects and other animal populations have declined and species are at risk of becoming extinct. We could change how we use land to plant more trees, restore upland bog habits and give more space to wildlife. Our landscape would start to act as a carbon sink as plants thrived. Wild spaces could attract tourists and leisure visitors. Our future landscape could look quite different. Are we willing to see changes made?" There would appear to be some discrepancy in what the Prime Minister, Government Ministers and local authorities are saying regarding the protection of our greenbelts, communities and health. Based on what all these departments have said - house building should be stopped! We should be looking after our communities. We should be protecting our "Green and Pleasant Land" .

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

Sound Reason:

See above comments

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

Duty to Co-operate Reason:

See above comments

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU624**

Site ref (if applicable): **LP0952**

Person ID: **1243017**

Name: **Mrs Jowett**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Please refer to the attached document.

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

Sound Reason:



Please refer to the attached document. There are a number of issues with the proposed plan which are also applicable to (LP0177, LP0026, and LP1625) in the Greetland area. In addition, it is important to consider how strongly the local community feels about the proposed development to the highly sensitive greenbelt area. You only have to look at the >600 members of the local pressure group which has received press coverage as well as regional television attention to evidence this. The group are extensively lobbying to demonstrate how opposed the local community are to the proposal which looks to have a devastating impact on the local area.

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

Duty to Co-operate Reason:

Please refer to the attached document.

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5606078>

Comment ID **HRU628**

Site ref (if applicable): **LP0952**

Person ID: **1243019**

Name: **Mrs Sally Farrar**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

See comments below.

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

Sound Reason:

OBJECTIONS TO SITES LP0026, LP0177, LP0952, LP1625 SITES IN GREETLAND The revision of Calderdale's local plan now includes a massive number of houses across 4 sites in Greetland, within a 0.8mile stretch of a busy B road. All of which is Green Belt. I just don't get it? How can any councillor, cabinet member, planning officer or local government officer even consider the destruction of green belt and open spaces in this area. This is not sustainable and will destroy this area for good, The impact of this for our nature and for our community will be catastrophic. Greetland is a small, historic village on a hillside, surrounded by playing fields, open grazing land and moorland at the top, and by open grazing fields, woodlands, a small river and a long existing wildlife corridor in the valley bottom. The hillside is criss- crossed with ancient public footpaths, and an old, well worn public footpath runs through our wildlife corridor in the valley bottom, travelling the whole length of the proposed local plan site. Green and open spaces around us keep us sane and healthy. We love living here and we use our open green spaces each and every day for fresh air, for walking and exercise, and to engage with the natural environment which is on our doorstep. Mass housing development across these sites will have adverse effects immediately and for future generations. The natural habitats of the wild deer, foxes, bats, owls, herons, field mice and squirrels will be destroyed or changed forever due to noise and light pollution, general disturbance, and by upsetting the natural balance of these areas. Our wildlife will disappear and our youngsters will not experience the sounds of the owls

hooting in the night nor see the bats flying about at dusk. One day they will just have to research these things on the internet. How sad is that? Without green and open areas in our community, people will have little option but to jump into their cars and drive somewhere else in order to enjoy natural open spaces and learn about nature and wildlife. Car fumes then causing further damage to the environment. That does not make any sense nor it is sustainable. Changing economy following Brexit The Local Plan was drawn up between 2016 and 2018, with amendments made in October 2019. The plan was based on housing requirement to support the economic growth plan. This country has just seen its biggest change in 47 year as we have now left the EU. The Local plan is now out of date and should be reviewed as housing need will be significantly smaller post Brexit. Reduced immigration will lead to a reduction in the amount of new housing required and therefore reduce the need to release Green Belt. A few small businesses and light industries exist in this area but there are no large employers locally and there are no new sites identified for planned local employment. This will mean that people moving into Greetland will have to travel out of the area for job opportunities, Loss of green belt and wildlife corridor According to the Local Plan, all of this land is classified as -“highly sensitive green belt” We need to protect it not lose it. NPPF Section 13 Protecting Green Belt Land Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: 1) to check the unrestricted sprawl of large built-up areas (2) to prevent neighbouring towns merging into one another (3) to assist in safeguarding the countryside from encroachment (4) to preserve the setting and special character of historic towns (5) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Calderdale Council, in its own evidence, concludes that this area of Green Belt performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt but, most decisively, would see the coalescence of Greetland and West Vale and the deterioration of the identity of both places undermining the Council's Settlement Hierarchy. Notwithstanding this, extreme number of housing proposed in and around the site is undeliverable during a single plan period in plan-making terms and unsustainable in infrastructure terms in relation to the capacity of existing highways, schools and local services. Esther McVey's (former Housing Minister up to Nov 2019) written policy on Green Belt land quotes: "protecting the Green Belt goes beyond protection against development" -“ My department is working with DEFRA (Department of Environment, Food & Rural Affairs) and Natural England on the once-in-a-generation Environment Bill which will establish a comprehensive legal framework for environmental improvement and make net gains for biodiversity mandatory for new development. Of course one of the most important environmental safeguards we have is the Green Belt. And I want to be clear that our commitment to this is as strong as ever, with any changes only happening in exceptional circumstances ; protecting the Green Belt goes beyond protection against development" Exceptional circumstances in The Government White Paper -“Fixing our Broken Housing Market” Paragraph 1.39 states that: -“The Government wants to retain the high bar to ensure the Green Belt remains protected, but we also wish to be transparent about what this means in practice so that local communities can hold their councils to account therefore we propose to amend and add to the National Policy to make it clear that: authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including making effective use of suitable brownfield sites and the opportunities offered by state regeneration : Do Calderdale Council have the evidence that they have done this? CPRE also state "The development of brown fields sites should be a priority; there are more than enough brown field sites to fulfil the requirement without having to encroach onto Green Belt". There are plenty of brownfield sites in Calderdale that would enhance the area by development and these are the sites Calderdale Council Planning Department should be targetting, thus complying with the current legislation and Central Government policy. Calderdale Council Planning Dept has stated several times that developers are not interested in brownfield sites . This is against Government Policy and does not constitute exceptional circumstances . Accordingly, this site in the existing Green Belt should be removed from the Plan as the exceptional circumstances for its release do not exist. Increased Traffic and congestion on Saddleworth Road, particularly at the traffic lights junction with Stainland Road There has been chronic

congestion at the 2 traffic light junctions in nearby West Vale for a number of years now. This crossroad junction carries traffic from Greetland, Barkisland and Ripponden, traffic to and from Elland and Junction 24 of the M62, and all traffic travelling between Halifax and the villages beyond the Outlane area of Huddersfield and Junction 23 of the M62. This junction is dangerous and congested throughout the day, especially since a Cooperative store was sited in the middle of the Saddleworth Road/Stainland Road traffic light junction about 4 years ago. Vehicles including buses and trucks fight over the space at both junctions in West Vale and often selfishly push their way through when the lights are red, in turn putting other road users and pedestrians at risk of harm. The flow of slow moving vehicles is constant and air pollution here has increased as a consequence. The local roads are incapable of taking any additional traffic. Calderdale Council are proposing to allow 600 plus properties to be built on Saddleworth Road thus adding to the chronic issues which already exist. The WSP Brinkerhoff Report of May 2017 has indicated that traffic will increase by over 107% if the proposed housing developments were to go ahead. Calderdale have suggested that one solution here will be to alter the traffic lights, presumably to allow more traffic off Saddleworth Road, but this does not make any sense as the all of the other traffic using the junction will back up further. This is a ridiculous "solution" to the problem and is not feasible nor sustainable. Calderdale Council plan to manage traffic in the area by creating a new junction on the A629 for traffic travelling between the Elland bypass and Sowerby Bridge. Additional traffic lights here will only cause the traffic coming from West Vale to back up, especially as there is a low railway bridge for high sided vehicles to negotiate. This is not a viable nor sustainable solution. Increased air pollution What about Clean Air for all ? The primary goal of the Clean Air Act is, I quote - "to achieve national ambient air quality levels protective of public health and welfare by establishing air quality standards and imposing limitations on air pollutant emissions from both stationary and mobile sources" A huge increase to the number of vehicles (due to the proposed housing developments) using and sitting in traffic queues on the lower part of Saddleworth Road will impact negatively on the air quality in the area. There is an infant school and pre school located between 2 of the proposed large housing sites on Saddleworth Road. Traffic around the school is already a major safety issue and the road around the school is a bottleneck twice a day. Increased emissions from the standing traffic will affect the children and families using the school and those living near the school. Air quality standards will be compromised. The centre of West Vale probably has poor air quality already. Let's not add to it for the sake of our health. Calderdale Local Authority is already in the top quarter of deprived authorities so the quality of our living space is crucial. We all need to realise the cost of air pollution. Traffic is the biggest air pollutant. Poor air quality where we live impacts on health and care costs, due to increasing incidents of disease, lung problems and cancers. Clean air is crucial for our health and well-being, and Greetland is a community continually trying to create a better and healthier environment for the benefit of everyone. Money has been obtained from the Woodland Trust for a large number of trees to be planted in the area. This is being undertaken in order to maintain good air quality and to help preserve the habitat for the wildlife corridor here. Massive house building in the area will negate these actions. Flooding The green belt sites on Saddleworth Road proposed for housing development are flood plains and actually flood when rainfall is particularly high. These sites flooded very badly on Boxing Day 2015 and again as recently as 8th and 9th February 2020 and this weekend 15th February 2020. This has been particularly dreadful for properties situated below Saddleworth Road. Residents have already posted images of the flooding in this Portal for reference. The Black Brook (our small river) collects all of the run off from the hills and fields the length of the Blackburne Valley. Over the years, the path of the Black Brook has altered as the heavy volume of water gouges out new routes for itself downhill and in the valley bottom. The fields here are a natural and essential soak off and any building on this land would further increase the flooding in immediate area, and of land, properties and businesses downstream of the Black Brook. Current policy and legislation on flooding states "due to every increasing wide-scale flooding incidents in the country and the ever increasing threat of climate change new development in a flood area that increases the risk of flooding in the development's community or elsewhere is not permitted". Calderdale Council Planning Department has a duty of care to comply with current policy and legislation on flooding. Housing should not be built on sites such as this. On the last

Local Plan these sites were graded as a Class 1 Severe Risk Flood Area (LP0177) and were removed; in compliance with current legislation they should not have been put back into the amended Local Plan in October 2019. Flooding in the valley below Saddleworth Road contributes to flooding in the Calder Valley. The Black Brook flows through West Vale and discharges into the river Calder in Elland. In 2015 and sadly ongoing this week, major flooding has occurred on the River Calder at Todmorden, Hebden Bridge, Mytholmroyd, Sowerby Bridge, West Vale, Elland and Brighouse. The huge number of housing units proposed for Greetland will increase greatly the peak flows and volumes of runoff from the area. Developers use Sustainable Urban Drainage techniques to slow this flow down, but the clay soil in this area make this technique unsuitable. The alternative is large storage areas either above or below ground. These techniques will reduce peak flows and slow down the flows but they do not reduce the volume of runoff which will be more than doubled, and in turn contribute to flooding in West Vale, Elland and Brighouse. Severe flooding continues to be disastrous for local businesses, both small and large, destroys people's lives and impacts negatively on the local economy. Sewer Flooding The sewers that run close in the Black Brook and down Saddleworth Road are already overloaded with combined sewer overflows (CSO) that discharge into the brook. The proposed housing will more than double the number of houses connected to these sewer systems. The additional foul flows will almost double the flood volumes and significantly increase the number of spills and volumes from the CSOs which will increase the pollution to the brook. This will have a negative impact on the fish and wildlife in the area. The Environment Agency have a no deterioration policy for CSOs but there are currently no plans to upgrade the sewer system in Greetland and West Vale to negate this impact. Lack of infrastructure Saddleworth Road is a very busy B road carrying a great deal of traffic up and down the valley, including many heavy stone trucks from the quarries and heavy trucks from Sonoco, the nearby recycling plant, There has been one fatality on this stretch of road in the past 3 years. Allowing large scale house building on Saddleworth Road will be dangerous and cause huge problems not only on this road itself but for the adjoining narrow roads and areas. Calderdale Council do not have any plans in place to improve safety or traffic congestion on Saddleworth Road. They propose that long standing traffic problems in West Vale will improve following the creation of a new junction on the A629 towards Halifax, but I do not see how this can possibly alleviate the problems in the immediate locality of West Vale/Saddleworth Road. A planned station at Elland (no-one seems to know when this is meant to happen) will not alleviate any of this congestion either, as more housing in Greetland will mean more cars travelling through West Vale junction to access the station!. Traffic from the wider area will also have to come through West Vale to access any station. Public transport links remain poor on Saddleworth Road and have not altered in years. There is one bus an hour into Halifax or Elland for shopping and other services and the nearest train station is a car or taxi journey away. Apparently at the Local Plan Meeting it was stated: "We will ensure that there are bus stops near any new developments" I do not see how this will help at all as we do have bus stops already but not much of a bus service! Local primary and senior schools are full. With a proposed 600 plus new houses here, another 200 school places will likely be needed locally. Local GP practices are already under strain. Further strain on local hospitals Local Dentist has a waiting list of 600 for NHS places.

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

Duty to Co-operate Reason:

In 2016 regarding the first Local Plan a petition with 161 signatures objecting to building on our beautiful Green Belt was presented to Calderdale Council Planning Department and 30% of the total objections submitted from the whole of Calderdale residents were from the Greetland area alone. These objections will still be relevant as nothing has changed since that period of consultation but I understand that these comments have just been archived and cannot be brought forward to this amended Local plan consultation. Calderdale Council has not been helpful or open about this new consultation period and have failed to make the residents aware of the need to submit new objections to the amended Local Plan and the timescales for this. The Council probably hoped that the amended local plan (with the additional sites

included for Greetland and Elland), would slip through un-noticed and unchallenged. I do not consider that Calderdale Council have acted in a fair, open, honest and transparent way in regard to the amendments made to the Local Plan

Suggested Modifications:

That the 4 sites in the Greetland area (LP0026, LP0952, LP0177, and LP1625) be removed from the plan.

Comments:

Additional Evidence Link:

Comment ID **HRU653**

Site ref (if applicable): **LP0952**

Person ID: **1243064**

Name: **Mr Martin Cleminson**

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 believe the plan to build hundreds of houses on this site are not sound for a number of reasons. Green belt: The land earmarked for being developed is green belt land. This is supposed to be protected land. There are brown field sites nearby such as the recently demolished mills at West Vale which should be considered instead for development. There are no exceptional reasons to remove the area's Green belt status and it goes against policy to prevent urban sprawl. Wildlife: This land is the home to many species of animals, many of which are protected. These include bats, deer, foxes, herons, owls, and sparrowhawks. There are also many mature trees which should be protected. There are public footpaths across the site and this is a well-used site where people enjoy spending time in the fresh air. Flooding: Areas of the fields on which these new houses are proposed, are part of a flood plain. Since 2015 these fields have flooded completely three times, the latest time being during Storm Ciara in February 2020. The existing volume of water currently causes flooding further downstream, including West Vale Cricket Club, the Bowling Green, and adjacent allotments. The overflowing Black Beck adds to the flooding of Heath Rugby Club and garden centre on Stainland Road. Any additional development will cause further fast flowing run-off from roofs, roads etc., and increase the flooding further, having far-reaching consequences for not only the owners of these future houses, but also the rest of Greetland, West Vale, Elland and as far as Brighouse Air pollution: The development site is in a valley which traps fumes. The proposed developments added together could bring 1000 or more extra cars, and with them, a massive increase in air pollution to the children of Greetland Academy (especially the youngest children, the infants, whose part of the school is located on Saddleworth Road), as well as the toddlers and pre-schoolers at Sunnybank Pre School. Traffic Congestion The existing road network in West Vale cannot cope with the current traffic at rush hour. Traffic regularly backs up significantly on both Saddleworth Road and Stainland Road. The increase in cars and road usage through Greetland will lead to more traffic jams as they struggle to get through the bottle neck. This will have a detrimental effect on all sides of the traffic lights, including the ones which are located next to West Vale Primary School as well. Infrastructure. The amount of houses being planned in Greetland is completely disproportionate to the size of the village. 600 new homes in total all being built off

Saddleworth Road will increase the population of Greetland by around 30% in an area where the infrastructure is not appropriate. Greetland is a community in its own right but is a village, not a town. The local schools are full, the doctors and dentists' surgeries are not taking on new patients, the road network is pushed to breaking point, the sewer system is at capacity.

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

Duty to Co-operate Reason:

Suggested Modifications:

Sites with suitable infrastructure or brownfield sites should be considered.

Comments:

Additional Evidence Link:

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Comment ID **HRU671**

Site ref (if applicable): **LP0952**

Person ID: **1118926**

Name: **Mrs Denise Walker**

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:

Another prospective huge development site, the village does not have facilities and infrastructure to cope with these plans. Flooding issues ..... light pollution, which affects residents and wildlife .... The knock on effect to the rest of the village, shortcuts taken up and down Brian royd, Spring and Martin green lane, Sunnybank drive all have enough traffic as it is. The land has always been a flood plain for the hillside, I - "paddled -" in it as a child. Environmentally it would be disastrous. I do hope you will consider these comments.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU717**

Site ref (if applicable): **LP0952**

Person ID: **1242716**

Name: **Mrs Elyse Margetson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I am not qualified to assess this. However, I would comment that the process to object is neither easy or straight forward and the online forms and documents presented are complicated, lack clarity and make it challenging and off-putting to object. Although I am a technologically literate person I have found it onerous to find my way around the information. Additionally, I feel that insufficient time has been allowed for full consideration of all the documents which need to be read to understand this issue fully and for objections to be made. I also have significant concerns about the way in which the Local Plan has developed and cannot be sure that it is free from political bias. Having read the report ' CC37 - Potential Sites - considered and rejected, November 2019 - Report on options rejected ' I see that the main difference with those sites rejected and the sites LP0026, LP0177, LP0952 and LP1625 which were accepted were that they didn't have a developer on board! This makes me very concerned that the desire to develop land quickly, because there is a ' developer on board ', may have been a key factor as to whether a particular location was included in the Local Plan, especially as I note that in the Consultation comments there are already a set of plans from Barratt Homes for site LP0177. The interest and profits of prospective developers should not be a reason at all (never mind a key reason) for a site being included or excluded from the plan. The other reasons cited for excluding sites such as Green Belt, Access, Wildlife issues, Flooding constraints all apply to sites LP0026, LP0177, LP0952 and LP1625 and therefore these sites should equally be rejected from the Local plan. Importantly, I would also comment that plans LP0026 (The Gate Farm), LP0177 (Land adjacent Ellistones Place), LP0952 (Land at New Gate Farm) and LP1625 (Land to the west of Silverdale Terrace) should not be considered as separate proposals. They are so interrelated (sited within a small 1 km area along Saddleworth Road) that they can only be assessed fairly if considered as a whole. By splitting them out as separate plans the full picture is being concealed. My comments therefore are relevant to each of the plans LP0026, LP0177, LP0952 and LP1625 and should be considered as equal objections to all four sites.

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

Sound Reason:

As a non-specialist lay person I can only comment from a personal, common sense and non-political perspective as someone who has lived within the Greetland community for a number of years and who has attempted to read the various policy documents attached to the local plan. My main points of objection are as follows: Loss of Greenbelt land Increased risk of flooding Loss of Wildlife Habitats Lack of Infrastructure Traffic congestion, air pollution and noise pollution 1. Loss of Greenbelt Land Once it's gone, it's gone! We cannot bring back Greenbelt Land once it has been built upon. Land that is precious to this community and to the wider community - from a visual, physical and emotional perspective - to both humans and wild animals. Para 98 of the National Planning Policy Framework (NPPF) states that ' Planning Policies and decisions should protect and enhance public rights of way and access '. There are public footpaths through all the sites in the proposed development plans which are used by groups and individuals from both within the local community and from further afield. I personally regularly use these public footpaths to dog walk. It is important to have this safe space to exercise, particularly as it feels unsafe to walk along the main Saddleworth Road with the heavy lorries hurtling down, and with many of the side roads having no or insufficient pavements. I am also aware that many Duke of Edinburgh groups use these public rights of way as part of their expedition practices (both of my daughters have taken part in such walks). To take away these footpaths is to deny our young people the opportunity to enjoy the

countryside and open air whilst undertaking physical activity in a natural and safe environment, away from traffic, crime and pollution. To allow these developments would be to create urban sprawl, gradually encroaching on precious greenbelt Land that our community relies on for our wellbeing. The NPPF at a para 133 states that -“ The Government attaches great importance to Green Belts ”and at para 136 that - “Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified” At para 144 it further states -“ local planning authorities should ensure that substantial weight is given to any harm to the green belt”and at para 145 -“ a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt ” Building on these sites is contradictory to all of these statements. I do not see any exceptional circumstances evidenced or justified in these proposals to allow building on this Greenbelt land. I note that comments, from what appears to be the Council, have been made on each individual plan to the effect that ' The site is currently designated as greenbelt but also performs the function of a natural/semi-natural open space. An assessment of open space in the area shows that there are sufficient alternative natural/semi-natural areas within the catchment of this site to meet the adopted standards ' - I do not agree with this statement. When each of the 4 sites are reviewed together a large and disproportionate area of open space would be lost to this small community. At para 137 the NPPF states ' 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. '. I do not agree that the authority in this case has satisfied these conditions. There are many other sites, including disused mills, within the Calderdale catchment that do not sit within Greenbelt Land that could be considered for development before ruining for ever the Greenbelt Land in these sites.

2. Increased risk of flooding I have lived within this community for just over 4 years and within that time the area has suffered extreme and severe flooding on 2 occasions, the latest being on 9th February 2020 with Storm Ciara. The effects are plain to see and are all over social media for anybody to review. Para 155 of the NPPF states that ' Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas of highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere ' Greetland is a high risk flood area within Calderdale. The Greenbelt Land within these proposed development sites act as a natural soak away and flood defence both within its own locality and all along Saddleworth Road. As you move further down West Vale the land soaks up a vast quantity of rainwater as well as the natural springs that pop up all over the hillsides of Greetland. Losing these flood plains would cause the water to simply be diverted elsewhere, causing certain flooding further down the area. Examples are being seen already of these sorts of issues in other local areas as planners to failed to account for the loss of natural flood plains (for example see link <https://www.halifaxcourier.co.uk/business/giant-factory-building-work-calderdale-firm-causing-flooding-houses-claim-residents-1556588>). I urge the decision makers to think logically and show some common sense in realising that you cannot keep taking away the natural flood plains without it causing devastating consequences. The frequency of flooding is only set to increase with the change in weather conditions we are experiencing through global warming. The natural flood plains are therefore becoming increasingly important to our communities. No measure of mitigation can take away these natural resources - all they do is push the issue further down into other areas. To build on these sites would not only guarantee flooding issues and untold misery for residents and local businesses but cause increased expenditure for the council and local authorities as they will be required to assist with clean up operations, as has been seen over the last week or so in many parts of Calderdale. Para 158 NPPF states ' Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding '. I do not see any evidence that the planning authority has exhausted other options of seeking development sites in lower risk flooding areas.

3. Loss of Wildlife Habitats I often see wild deer running through the fields. I regularly witness squirrels, pheasants, bats and foxes in the area. Para 177 NPPF states that ' The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in



combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site'. I would argue that building on the land which is included in these proposals will be extremely detrimental to the wild animals within the area. No mitigation can prevent the impact of urban sprawl and the destruction of their natural habitats.

4. Lack of Infrastructure The local schools are already full. The local dentists have long NHS waiting lists. The GP surgery is full and often can't accommodate appointment requests. Adding an additional 600+ houses and the associated increase in residents is simply unsustainable. The local bus services are already inadequate for the community. The 503 which passes through West Vale is often so full that it does not stop to pick up passengers at peak times or it is delayed 20-30+ minutes because of the traffic. The 343 which passes through Saddleworth Road only once per hour takes up to an hour to reach the destinations of Huddersfield or Halifax. The bus stops for the 343 are only on one side of Saddleworth Road, making it extremely unsafe for the young and elderly alike. Since moving here and hoping that my teenage children would be able to get the bus to school, we have found that it simply is not feasible or safe for them to do so. How will adding additional residents - who will also need to use their cars - improve this situation? The local roads are already riddled with potholes and are constantly patched (an unsatisfactory and unsustainable situation). They are constantly under repair as the local drainage system is ineffective and causes regular surface issues. Add to that a level of increased traffic caused by the development as proposed and the road conditions will be worsened even further. Specifically with regard to site LP0026, the preferred access as stated on the plans is off the lower section of Scar Bottom Lane. For anybody who knows this road and uses it regularly, creating an access point on it to this housing development is ridiculous. It is a narrow lane with no pavements and dry stone walls at either side. It is already not wide enough for 2 cars to pass without having to come to a virtual standstill. It is certainly not wide enough to create an access point for 60-70 houses. I can see nothing in the proposals to remedy the lack of infrastructure.

5. Traffic congestion, air pollution and noise pollution Greetland and West Vale already suffer chronic traffic congestion, with the roads used not only by locals but also by the large wagons travelling to and from the Bosch Industrial Estate and the Sonoco factory. In addition, the road is used as a cut through from Ripponden and the M62. The village is already at breaking point at peak times and the roads cannot cope with the existing volume of traffic, let alone adding to that with these proposed developments. At school drop off times Saddleworth Road becomes a single lane road due to the parked cars on both sides. It becomes an obstacle course to get through and the large lorries that frequent the area make it dangerous for road users and pedestrians. I fear for the lives of the children trying to get to school daily. Adding the level of traffic that would be inevitable with the proposed development would be frankly overwhelming. By increasing the congestion in the area, the air pollution will by default increase. This will especially have enormous impact on the young children attending the schools in the area and Sunnybank Pre-school with its playground just metres away from the busy congested road. Similarly, a disproportionate scale of building in this area would create a disproportionate increase in the level of noise pollution to this community.

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

Duty to Co-operate Reason:

I do not understand what this means.

Suggested Modifications:

Proposed plans LP0026 (The Gate Farm), LP0177 (Land adjacent Ellistones Place), LP0952 (Land at New Gate Farm) and LP1625 (Land to the west of Silverdale Terrace) should all be removed from the Local Plan

Comments:

Additional Evidence Link:

Comment ID **HRU723**

Site ref (if applicable):

Person ID: **1239176**

Name: **MRS Jo Greidanus**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Please refer to Calderdale's Statement of Community Involvement, which has not been followed in this process. CMBC have already stated "These sites lies within the approved Green Belt. The proposed development does not meet the exceptions, as it does not preserve openness and conflicts with the purpose of including land in the Green Belt. As such, it represents inappropriate development in the Green Belt, which is, by definition, harmful. No very special circumstances have been demonstrated to clearly outweigh the harm caused by the development. It is therefore considered that the proposal would be contrary to NPPF Chapter 13 (Protecting Green Belt Land)"

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

Sound Reason:

LP0177, LP0026, LP0952 and LP1625 are so close in proximity that they should be viewed jointly as well as individually. They are all in Greetland which is not Elland so why have they been recorded on this plan as Elland. Main points of objection 1 - Flooding 2 - Loss of green belt and impact on wildlife corridor 3 - Air Pollution and Traffic 4 - Infrastructure Flooding The DEFRA 25year plan states that "National flood management involves the use of a variety of measures including storing water on open land". NPPF 14 (157b) states that plans should work to safeguard land from development that is required or likely to be required for current and future flood management. The flood plains that these sites provide are critical and flood regularly (as can be seen today) ; soaking up excess water at times of heavy rainfall, allowing space for the water to flow and be stored on open land in times of flood, even after the river has burst its bank, and protecting land further downstream from potential flooding. Developing these sites is completely contradictory to this DEFRA plan and the NPPF. The current policy and legislation on flooding states -"due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere. Chapter 14, paragraph 163 of the NPPF states: -" When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere It is abundantly clear that any development on theses sites would directly oppose all these pieces of legislation and policies and would hugely increase the risk of flooding to both surrounding properties and the wider community in Greetland, West Vale and even as far as Elland. Any development of these sites and reduction in the capacity of these flood plains will only ensure that the flooding we now see will be more frequent and cause even more damage. This is not acceptable or fair therefore these sites should be removed from the local plan. Loss of Green Belt and Wildlife Corridor Esther McVey, our current Housing Minister's written policy on Green Belt land states "protecting the Green Belt goes beyond protection against development" NPPF chapter 13 states that there are 5 purposes to green belt land- CMBC has already stated that this land strongly fulfils these 5 purposes. NPPF ch13 paragraph 143 states "Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances". Protecting the green belt is very important. To include these sites in the local plan goes against all the above policies and there is no evidence of any special circumstances to support development on this land. The sites are a wildlife habitat for many many different species. CMBC has already stated that a constraint is that Black Brook

running through LP0177 is a UK BAP priority habitat. NPPF Chapter 15 states that planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes and sites of biodiversity. It also states - to protect and enhance biodiversity and geodiversity, plans should: identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including wildlife corridors. Developing these sites will put this precious wildlife corridor and all its inhabitants at great risk directly opposing the NPPF legislation and the DEFRA 25 Year Plan. This site should therefore be removed from the local plan. Air Pollution and Traffic Congestion Air pollution and traffic congestion obviously go hand in hand. The junction of Saddleworth Road and Stainland Road in West Vale is already a bottle neck and far too congested and unable to cope with the traffic volume that passes through it on a daily basis. WSP Parsons Brinckerhoff Report on this Transport Network identifies that traffic congestion at the juncture of Stainland Road-Saddleworth Road would increase by approximately 105% traffic congestion at the juncture of Stainland Road-Rochdale Road would increase by over 100% Public Health England (PHE) (11th March 2019) reports that air pollution is the biggest environmental threat to health in the UK, with between 28,000 and 36,000 deaths a year attributed to long-term exposure. There is strong evidence that air pollution causes the development of coronary heart disease, stroke, respiratory disease and lung cancer, and exacerbates asthma. Professor Paul Cosford, Director of Health Protection and Medical Director at PHE, said: "Now is our opportunity to create a clean air generation of children. Key interventions local authorities can take include redesigning cities so people aren't so close to highly polluting roads." Professor Cosford said: We recommend that at a local level, any new policy or programme of work which affects air pollution should aim to deliver an overall benefit to the public's health. Greetland School and Sunnybank Pre School are right on Saddleworth Road at the boundary of LP0177. The increase in traffic of over 100% and therefore pollution, that will be an outcome of development on this site ignores all the recommendations of PHE and put many people's health at risk especially that of our children which is totally unacceptable. Infrastructure Greetland Primary Academy, West Vale Primary School and Brooksbank High School are all full. With a proposed 600 houses, using Calderdale MBC's figure for school places of .36 per household (IDP section 9.14) this indicates another 206 school places would be needed. Where are these places to be found? Local Dentist has a waiting list of 600 for NHS places. The nearest NHS dentist was recently found (July 2019) 11 miles away in Kirklees. Local GP surgeries are already full. It is obvious that building a further 600 houses within this area will completely overwhelm the existing infrastructure making this land unsuitable to develop. Summary There are so many constraints and negatives to all these sites that cannot be adequately mitigated against. To develop these sites opposes so many policies, recommendations and pieces of legislation which CMBC appear to have given little or no consideration to. I respectfully ask that these sites are removed from the Local Plan. They should never have been included as they are completely unsuitable for numerous reasons. As this portal is difficult to use and I have struggled to attach the photo evidence of flooding that I have mentioned, I will be also emailing my objection with photos attached.

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

Duty to Co-operate Reason:

Suggested Modifications:

Remove sites from local plan and leave as greenbelt

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5610060> ; <http://calderdale-consult.objective.co.uk/file/5610062> ; <http://calderdale-consult.objective.co.uk/file/5610065> ; <http://calderdale-consult.objective.co.uk/file/5632241> ; <http://calderdale-consult.o>

Comment ID **HRU727**

Site ref (if applicable): **LP0952**

Person ID: **959779**

Name: **Mr Stephen Cunningham**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The revised Calderdale Plan was drawn up between 2016-18 and is no longer fit for purpose. The UK has just seen its biggest change in 47 year as we have now left the EU. The plan was based on housing requirements that supported the economic growth plan. The plans are not current and not compliant. Economic growth should be called for review

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

Sound Reason:

My objection to the proposed planning application is referenced where possible using sections of the National Planning Policy Framework (NPPF) the relevant paragraphs are referenced in brackets Negative impact on the Green Belt The proposed development represents a disproportionate amount of new development in Greetland. It will lead to urban sprawl (NPPF 134a); it also encroaches on important green space (134c), removes natural habitat (174a) and takes away an integral part of the wildlife corridor (170d). The Government supposedly attaches great importance to the Green Belt (133). The aim of Green Belt policy is to keep the land permanently open for the benefit, enjoyment and wellbeing of people. It also exists to support biodiversity and enhance the local landscape and visual amenity (141). If the proposed application ; along with other similar proposals - is passed we lose the Green Belt forever. This should only happen in exceptional circumstances (136). What are these exceptional circumstances? This proposal would be harmful to the Greenbelt so should not be approved (143). I have lived in Greetland for many years and seen large areas of green space lost to infilling. The demolition of older properties to accommodate new housing developments has led to the loss of trees, wildlife habitat and buildings of historical interest. We have also lost moorland; large gardens have been built on, even graveyards and recreational space has been developed. The argument for this infilling from Calderdale Council has always been that unless we accept it we will lose the greenbelt! Now that there is no place left to infill they want to start taking away the greenbelt. If we carry on like this Greetland will lose all its green space and biodiversity. The function of the Calderdale Council Planning Department is to facilitate sustainable development that make a positive contribution to the local environment (144). It is NOT the role of the Council to make unacceptable sites within the Green Belt available to meet their housing targets. Flooding The proposed development will only add to our current climate change problems. This is already in the balance. On Sunday 9 th February I parked next to the Black Brook in West Vale to buy groceries. The water line was close to bursting. I then walked towards the rugby club on Stainland Road where the river Calder had overflowed into the nearby fields. The football pitches and rugby club were under several feet of water. Buildings and cars were completely submerged, roads barely passable. I also discovered later that a large shipping container used to store equipment at the rugby club had been washed down river and had collided with Elland Bridge ; only recently re-opened in 2016 after previous collision damage during a flood. How can Calderdale Council declare a 'Climate emergency' then allow this development to proceed? The loss of flood plain and increase in run-off water from the proposed developments will only increase the likelihood of such devastation and further reduce local resilience to climate change (155, 156, 157). It will not only increase the flood risk in West Vale and Elland (163) but other areas along the Calder.

Infrastructure The development ; in conjunction with others ; will place a great strain on local services. Will new schools be built? How will the road network cope? The sewage and drainage systems are already at full stretch. Will there be new Health surgeries and Dental practices built into the proposals? This isn't acceptable to the local community (124) and it will not improve the character or function of the local area (130). Traffic impacts, congestion and air pollution Congestion at the junction of Sadleworth and Stainland Roads ; often backed up as far as Greetland Infants - is already unacceptable. At present it can take 20 minutes to get through the junction at peak times. Adding all the extra commuter traffic from the proposed development will increase congestion and the levels of harmful greenhouse gasses - nitrous oxide, carbon dioxide etc. This will have a detrimental affect on the health of local people particularly children at the school. The NPPF supports a low carbon future that helps to reduce greenhouse gasses and minimises flood risk (148, 149, 150a,b) not increase them. The proposed development is not sustainable in NPPF terms. It actually goes against many key criteria set out in the NPPF. When the harm identifiers are considered the proposals is not even close to being sustainable. I don't think Calderdale Council could actually have got it more wrong ; and they talk about a Climate Emergency! Not for the first time I watched this Climate Emergency play out in front of my own eyes last week; flooded roads, rivers bursting their banks, cars under water, homes and businesses completely destroyed ; real people devastated. It's easy for Calderdale Council to stand up and say anything - I think the time has come for them to stop talking and start taking some positive action to help local people and their communities.

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

Duty to Co-operate Reason:

Suggested Modifications:

The revised Calderdale Plan was drawn up between 2016-18 and is no longer fit for purpose. The UK has just seen its biggest change in 47 year as we have now left the EU. The plan was based on housing requirements that supported the economic growth plan. The plans are not current and not compliant. Economic growth should be called for review and a new plan developed in line with these changes.

Comments:

Additional Evidence Link:

Comment ID **HRU731**

Site ref (if applicable): **LP0952**

Person ID: **1116556**

Name: **Mr Roger Nichols**

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 is just one of the planning applications to develop the green belt space alongside Saddleworth Road between Greetland and Barkisland. There is absolutely no acceptable reason to build on protected green belt land when there is so much brownfield land available to use, not only in West Vale but in the whole of

the Halifax/Calderdale area. Obviously the site of the demolished mill in West Vale needs development and could provide many apartments/houses and, in the process, would not destroy or impact on the green belt land. By destroying the green belt, the proposed development would take away essential green space which is available for residents to enjoy but would also take away vital habitat for the multiple species of wildlife. The area is also subject to flooding and following periods of storms and heavy rain the water flows down from Norland Moor, running through the local roads and gardens and floods sites lower down the valley. As a result of global warming we are experiencing far more storms and periods of heavy rain and hence increased flooding in the fields. Local residents are also concerned with regard to access to facilities in the area which will be under increased pressure. The schools are full as are the doctors and dentists and, as a result, it can be difficult enough to get an appointment within a reasonable time at our local medical center already without even more people needing to be accommodated. There is also major concern regarding the huge increase in traffic flow which would be created by the massive amount of new housing. Obviously each house will have a minimum of one car or two cars and this huge increase will aggravate the already very difficult congestion at the traffic lights in West Vale. There are serious concerns regarding the increase of air pollution which will occur. The slow moving traffic and idling engines of both cars and heavy lorries is already creating so much air pollution and hence a major health problem. Finally, we would question the demand for more housing on such a large scale in Calderdale. As far as we are aware there is not massive unemployment or huge numbers of homeless families in the area so why do we need such an incredible increase in housing provision? If the idea is to create dormitory areas for people who work in Leeds or Manchester this is particularly impractical as the M62 is already jammed and congested at rush hours; in addition, the train service through the Calder Valley is desperately poor and inefficient as has been highlighted recently in the national media. If there is a demonstrated demand for more housing it should be allocated fairly round the whole of Calderdale not concentrated in one particular area using up precious green belt, and should be using ONLY THE BROWNFIELD SITES.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU750**

Site ref (if applicable): **LP0952**

Person ID: **958865**

Name: **Mr Andrew Jones**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Although I do not consider myself whether or not this is legally compliant it does seem that the rules regarding planning have not been adhered to with regard to cooperation/consulting, as I do not know of anyone locally who has received information or contact from the council regarding the removal of this land from greenbelt. Everything has been found out via facebook or word of mouth. Also, my understanding of

the planning framework is that it states that sites to be removed from greenbelt should only be done so in exceptional circumstances. In my opinion in this case there are NO EXCEPTIONAL CIRCUMSTANCES.

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

Sound Reason:

Wildlife - This land which is currently under greenbelt is home to many different species of wildlife. In this plot I have seen foxes, rabbits, birds of prey such as kestrels and bats (now a protected species). I have also heard the sounds of woodpeckers and owls nearby. In the adjacent woods there are also deer. By building on this land it will remove the natural habitat of these animals and they will suffer. Recreation - All of the wildlife above is part of what many people (myself include) enjoy about walking for pleasure and relaxation around our beautiful countryside. If this land is taken out of greenbelt and developed that enjoyment will be gone for good. Flooding - Although it seems from the plan that the areas within this plot are not directly on the flood plain all of these fields locally have natural water courses and springs running through them which could cause flooding to any new development. These now green fields act as a slow filtration system, soaking the water up in times of heavy rain and then releasing it gradually into the fields and flood plains below. If these fields were to be built on then there would be instant run off of the water directly onto the flood plains. The residents of the lower parts of Greetland and West Vale have recently narrowly avoided their properties flooding. I feel building in this land would increase their risk. Traffic - The developments which are being proposed along Saddleworth Road (which this plot is a major part of) suggests a total of 600 houses to be built. Most households nowadays own a minimum of 2 cars. This means an extra 1200 cars will be using Saddleworth Road. The junction of this road with Stainland Road is already unable to cope with the amount of traffic at peak times. With the proximity of the buildings to the road there is no room for road widening, extra lanes, etc. I myself have witnessed many near misses at the set of traffic lights at this junction caused by frustration of drivers not being able to progress their journey in reasonable time. In my opinion to add extra traffic to this road would be irresponsible and dangerous. The extra traffic would also pose an extra road safety risk for the school and the residents of Saddleworth Road. Pollution - The additional traffic would also create considerable extra pollution for the local people of the area including pupils at the school and those lower down in West Vale. The extra cars would all queue back up the road at crawling pace with engines idling. Not good for air quality or the planet. Urban sprawl - So many additional houses would massively increase the size of Greetland. The figures only show a small percentage increase as for some reason Greetland has been banded with Elland and Stainland. This is ridiculous and is not a true representation of the situation or the area. Services - The local schools are already at capacity and would struggle to take any more students. The doctors and dentists waiting lists are already stretched and would become unable to cope. The NPPF states that land should only be removed from greenbelt in exceptional circumstances and when all other brownfield sites have been used up or considered. There are other brownfield sites in the area (such as the mill at West Vale which has been demolished) which should be looked at before considering the greenbelt in question. When I have looked up other sites which have been considered and rejected, the reasons given for rejection are words such as 'greenbelt', 'sloping site', 'flooding and drainage issues', and 'no developer on board'. The only difference I see to our sites in Greetland is that there is a developer on board/interested. Just because someone is interested in buying land to build on is NOT exceptional circumstances to take it out of greenbelt. Developers don't care about wildlife, they just care about making money.

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

Duty to Co-operate Reason:

As a resident of Greetland I have had no form of contact from the council regarding the considered development and have not heard of anyone else having had any consultation either. I feel there has been

no cooperation or consultation through the whole process

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU756**

Site ref (if applicable):

Person ID: **960048**

Name: **Mr Gerald Standcliffe**

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:

Four sites are proposed Lp0952 new gate farm / Lp1625 silverdale terrace / Lp0177 ellistones place / Lp0026. an extra 1200 or more journeys a day will bring chaos, to the already overcrowded roads. Especially at west vale if there are any roadworks about will be total gridlock,also the infrastructure would not support any extra residents, the infant and junior school is full so is dentist and doctors, such amount of traffic will cause air pollution to a danger level especially to the elderly and small children at sunny bank school which is at road level. the proposed build is on mainly flood plain which floods fairly regular, this green belt corridor is a haven to wildlife and plants, roe deer, fox, herons, malards and other small mammals visit regular so does hikers dog walkers people walk along the beck side for exercise and admire the scenery, to loose this green belt site it would be a disaster and would be lost forever. do the right thing and reject the plan for 600 houses.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU761**

Site ref (if applicable):

Person ID: **1243285**

Name: **Mrs Karen Bagley**

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 writing to register our objections to the planning proposal off Saddleworth Road, Greetland. The reasons for objections are widespread but the most critical are as follows: FLOOD PLAIN ; the area proposed is on a natural flood plain and natural springs flowing down the Greetland hillside culminate at the proposed site. There is photographic evidence that local houses are subject to flooding already, so any further building would have a catastrophic effect on flooding in the area and beyond to West Vale and Elland. (Elland Bridge collapsed in 2015; Park Road in Elland floods every year; Heath Rugby club and Newbank Garden Centre in West Vale, prone to flooding regularly). There is photographic evidence to support this from residents as at today's date 9 th February 2020, when the flooding is at it's peak. GREEN BELT ; this is green belt land and as such, should be protected. Why aren't the council considering all the 'brown field' sites as a priority? This is a wildlife corridor - there are many protected species of animals and birds in the area, and it is used as a nature walk by all the community. POLLUTION / AIR QUALITY ; The pollution caused from a further potential 1200 cars on the roads is unimaginable and the health of the Junior School children would be at a high risk as would the whole community. It is a fact that increased pollution would seriously affect the health of our children both now and in future generations. INFRASTRUCTURE - the infrastructure is simply not geared up to cope with 600+ houses in that area, this would constitute a small 'village' in it's own right! Traffic is already chaotic in West Vale, how could the area cope with another 1200 cars in the area? Doctor's surgeries are already at capacity and the local school has no capacity to extend. We appreciate that there has to be a certain percentage of new housing developments in every village and town but a proposal for 600+ houses in this area is not acceptable on any level. This would cause catastrophic consequences to the area of Greetland and surrounding villages. This is in addition to a further potential development ; LP1407, which should be taken into consideration prior to any decisions on LP0026, LP0177, LP0952 and LP1625.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU764**

Site ref (if applicable):

Person ID: **1243284**

Name: **Mr Martin Bagley**

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 writing to register our objections to the planning proposal off Saddleworth Road, Greetland. The reasons for objections are widespread but the most critical are as follows: **FLOOD PLAIN** ; the area proposed is on a natural flood plain and natural springs flowing down the Greetland hillside culminate at the proposed site. There is photographic evidence that local houses are subject to flooding already, so any further building would have a catastrophic effect on flooding in the area and beyond to West Vale and Elland. (Elland Bridge collapsed in 2015; Park Road in Elland floods every year; Heath Rugby club and Newbank Garden Centre in West Vale, prone to flooding regularly). There is photographic evidence to support this from residents as at today's date 9 th February 2020, when the flooding is at it's peak. **GREEN BELT** ; this is green belt land and as such, should be protected. Why aren't the council considering all the 'brown field' sites as a priority? This is a wildlife corridor - there are many protected species of animals and birds in the area, and it is used as a nature walk by all the community. **POLLUTION / AIR QUALITY** ; The pollution caused from a further potential 1200 cars on the roads is unimaginable and the health of the Junior School children would be at a high risk as would the whole community. It is a fact that increased pollution would seriously affect the health of our children both now and in future generations. **INFRASTRUCTURE** - the infrastructure is simply not geared up to cope with 600+ houses in that area, this would constitute a small 'village' in it's own right! Traffic is already chaotic in West Vale, how could the area cope with another 1200 cars in the area? Doctor's surgeries are already at capacity and the local school has no capacity to extend. We appreciate that there has to be a certain percentage of new housing developments in every village and town but a proposal for 600+ houses in this area is not acceptable on any level. This would cause catastrophic consequences to the area of Greetland and surrounding villages. This is in addition to a further potential development ; LP1407, which should be taken into consideration prior to any decisions on LP0026, LP0177, LP0952 and LP1625.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU770**

Site ref (if applicable):

Person ID: **1239036**

Name: **Mrs Sarah Williams**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

No ; environmental and social issues not taken into consideration (see 'sound')

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

Sound Reason:

Flooding ; The area is of high flood risk, it is flooded right now. The brook is a natural defence to the running water down the valley. Where will this water go and what damage will it cause to the new and existing housing? Drains and sewers are often overflowing and burst. Wildlife ; This is a well-loved and used wildlife corridor that residents enjoy regularly. We should be protecting these areas and the wildlife included. On my route to school my children and I often see deer, herons, pheasants, and a variety of birds. This is what I, and many residents, love about living in the area and do not want to lose. The area is used by dog walkers, parents walking their children to school and we have a local walking group. This area is vital to our health and wellbeing and our Greenbelt should be protected at all costs. Traffic & Air Pollution ; The traffic from Greetland into West Vale is already awful, it can take up to twenty minutes just to get through the traffic lights at the bottom of Saddleworth road after the school run, I cannot imagine the effect on traffic and infrastructure by adding another 600 households to the area. The smaller roads such as Sunnybank, Bryan Royd are very narrow with cars parked both sides and are already used as 'through' roads, often meaning it is dangerous with children crossing and cars trying to pass. I experience this on a daily basis. The additional cars will also add to the air pollution, the cars, trucks, farm machinery and buses queue up Saddleworth road right next to the school and pre-school, exhausting toxic fumes for our children to breathe.

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

Duty to Co-operate Reason:

You have made it extremely difficult and complex to comment on this website ; I have had several system issues with passwords and the website being down. It is also misleading to list this under 'Elland Planning' as this is Greetland, not Elland. I do not feel qualified to answer the questions you ask regarding legal compliance and duty to cooperate, and feel this puts many people off commenting in the first place. However, the council have a duty of care to take into consideration environmental issues such as flooding, wildlife/greenbelt preservation, air pollution and climate change.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU807**

Site ref (if applicable): **LP0952**

Person ID: **1243003**

Name: **Mr Richard Corney**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The Local Plan does not address the implications of the National Planning Policy Framework, especially, NPPF Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. According to the NPPF Para 143 under 'Proposals affecting the Green Belt' it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' The very special circumstances are non-existent in this site. This development would definitely contribute to future flooding in the area. The plans have in no way had any in-depth consideration and the impact on the

infrastructure, environment and community will be devastating. One of the Greetland councillors - Marilyn Greenwood stated that she was not even told about the Planning Meeting when this plot was added!

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

Sound Reason:

Points of Objections Air Pollution Flooding Infrastructure Wildlife Traffic Congestion Loss of Public Space  
1 Air Pollution The severe increase in traffic (potential for 1200 additional cars which could equate to 2400 journeys each day) down an already congested Saddleworth Road. Already in peak periods the traffic backs up Saddleworth Road for at least ¼ mile with engines running! No air quality assessment has been undertaken in this area so we don't even know the extent of air pollution before the proposed development. Greetland Academy has the playground for nursery children right at the side of the road ; goodness knows how the proposed development will impact on these vulnerable, very young children which goes against the Governments strategy on air quality. 2 Flooding The area concerned floods at least once a year in varying degrees ; the worst instances have been Boxing Day 2015 and recently 9 th February 2020, the development will have a significant detrimental impact on flooding. The run off into Black Brook will cause serious downstream effects, for example, the floods of 9 th February saw Greetland Cricket Club, Heath Rugby Club and Clayhouse Park all under water ; so it is hard to understand how any flood plan could mitigate against the risk of even more severe flooding in West Vale leading to major issues for all the businesses and residents. It is impossible to understand how the proposals in the local plan can be in any way aligned to the recent declaration by Calderdale Council of a climate emergency. These proposals will inevitably lead to a flooding emergency, probably not what the Council had in mind by its declaration. 3 Infrastructure The development has only one road in and out and all the residents would have to use their cars as the development is not on a regular bus route ; again going against Government Transport Policy. Local schools are over subscribed meaning parents will have to use their cars to take children to schools out of the area. All doctors surgeries are currently full and one is soon to close again impacting on the two remaining local ones. Other developments in the area have been mainly 3 and 4 bedroom houses (not affordable housing for local people). This type of housing attracts commuters who typically work in Leeds or Manchester and will therefore have to travel to the motorway via West Vale or Ripponden neither which can cope with traffic as it is today! 4 Wildlife The local wildlife will be decimated by any further development particularly birdlife such as Herons, Kestrels, Kingfishers which are seen very regularly flying around the area. 5 Traffic Congestion It is already extremely difficult to pass through the traffic lights at West Vale and the development will only add to the congestion both in West Vale and also Ripponden. 6 Loss of Public Space The area concerned is a very valuable green space for people of all ages to enjoy daily and is extremely popular with walkers, runners, etc. It is a really tranquil spot where people can get away from the stresses of life. It is also within walking distance of the local community and therefore people do not have to drive to enjoy the countryside.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU811**

Site ref (if applicable): **LP0952**

Person ID: **1243147**

Name: **Mrs Sue Corney**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The Local Plan does not address the implications of the National Planning Policy Framework, especially, NPPF Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. According to the NPPF Para 143 under 'Proposals affecting the Green Belt' it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' The very special circumstances are non-existent in this site. This development would definitely contribute to future flooding in the area. The plans have in no way had any in-depth consideration and the impact on the infrastructure, environment and community will be devastating. One of the Greetland councillors - Marilyn Greenwood stated that she was not even told about the Planning Meeting when this plot was added!

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

Sound Reason:

Points of Objections Air Pollution Flooding Infrastructure Wildlife Traffic Congestion Loss of Public Space  
1 Air Pollution The severe increase in traffic (potential for 1200 additional cars which could equate to 2400 journeys each day) down an already congested Saddleworth Road. Already in peak periods the traffic backs up Saddleworth Road for at least ¼ mile with engines running! No air quality assessment has been undertaken in this area so we don't even know the extent of air pollution before the proposed development. Greetland Academy has the playground for nursery children right at the side of the road ; goodness knows how the proposed development will impact on these vulnerable, very young children which goes against the Government's strategy on air quality.  
2 Flooding The area concerned floods at least once a year in varying degrees ; the worst instances have been Boxing Day 2015 and recently 9 th February 2020, the development will have a significant detrimental impact on flooding. The run off into Black Brook will cause serious downstream effects, for example, the floods of 9 th February saw Greetland Cricket Club, Heath Rugby Club and Clayhouse Park all under water ; so it is hard to understand how any flood plan could mitigate against the risk of even more severe flooding in West Vale leading to major issues for all the businesses and residents. It is impossible to understand how the proposals in the local plan can be in any way aligned to the recent declaration by Calderdale Council of a climate emergency. These proposals will inevitably lead to a flooding emergency, probably not what the Council had in mind by its declaration.  
3 Infrastructure The development has only one road in and out and all the residents would have to use their cars as the development is not on a regular bus route ; again going against Government Transport Policy. Local schools are over-subscribed meaning parents will have to use their cars to take children to schools out of the area. All doctors surgeries are currently full and one is soon to close again impacting on the two remaining local ones. Other developments in the area have been mainly 3 and 4 bedroom houses (not affordable housing for local people). This type of housing attracts commuters who typically work in Leeds or Manchester and will therefore have to travel to the motorway via West Vale or Ripponden neither which can cope with traffic as it is today!  
4 Wildlife The local wildlife will be decimated by any further development particularly birdlife such as Herons, Kestrels, Kingfishers which are seen very regularly flying around the area.  
5 Traffic Congestion It is already extremely difficult to pass through the traffic lights at West Vale and the development will only add to the congestion both in West Vale and also Ripponden.  
6 Loss of Public Space The area concerned is a very valuable green space for people of all ages to enjoy daily

and is extremely popular with walkers, runners, etc. It is a really tranquil spot where people can get away from the stresses of life. It is also within walking distance of the local community and therefore people do not have to drive to enjoy the countryside.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU815**

Site ref (if applicable): **LP0952**

Person ID: **1128772**      Name: **Mrs Marie Louise Murawa**      Organisation:

Agent ID:      Name:      Organisation:

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

Legal Compliance Reason:

A total lack of consultation prior to formulating the LP for the inspector

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

Sound Reason:

Since 2016 there has been a marked review downwards of the areas housing needs, which is not recognised in the Council's assessment. The prospects of economic growth that the Council predicts is overly optimistic. Brownfield sites have been mainly ignored, at the expense of one of the few remaining Green Belt areas in Calderdale. The following appear not to have been given due consideration. Flooding Highways Ecology Open Space Housing Services Environmental Health Other factors Green Belt Flooding Please add your comments below: With the extensive building already present on Saddleworth Road, the south side already takes the majority of the run-off of rainwater and springs. The proposal to build over six hundred additional dwellings, the majority being proposed on the south side, will cause a problem for the lower valley and West Vale. Whatever drainage is considered suitable will still direct the water to the lower valley and West Vale. Extreme weather conditions that we now seem to experience has shown how devastating the result can be in Calderdale. Highways Please add your comments below: Saddleworth Road has speed limits ranging from 50 mph, to 30, 20, and back to 30. With blatant speeding in the 30 mph zones, and stationary traffic in the 20 mph zone, at peak times, it is already difficult to navigate. There have been fatalities in addition to other serious incidents. With the prospect of over six hundred additional dwellings and two cars planned per household, Saddleworth Road will become a lengthy car park. There is no prospect of additional employment in the area, so all resident will be obliged to travel to work. Schools are already full subscribed, so would school children be expected to travel to school. Whatever is attempted at West Vale to ease traffic flow, roundabout, slip road, etc., traffic from four directions will still all converge on West Vale. Everyone is also aware that prospects of additional employment in Calderdale is limited, so any new developments on these sites will spawn commuters heading to and from Leeds and Manchester, with both additional pollution and traffic congestion Ecology Please add your comments

below: Currently the valley enjoys the presence of; herons, squirrels, foxes, and other wildlife, who share the area, to the benefit of residents. Open Space Please add your comments below: Besides supporting farming, and the existing wildlife, the open spaces are enjoyed by walkers, cyclist, horse riders, and many others. They offer mental and physical wellbeing, dilute pollution, and allow vital recreation and exercise. Once greenbelt/open space is lost it will never be returned. Is this the bequest we wish to leave the next generation? The north side of Saddleworth Road has already been over developed. The area has already had a disproportionate level of building for its size. To turn the whole valley into a housing estate would be a travesty. The existing green belt should be allowed to remain, with efforts being made to fulfil the housing requirements with brownfield development. Environmental Health Please add your comments below: The further addition of possibly 2000 domestic vehicles, which would entail travel to places of employment, education, or social and pleasure, outside the immediate area, would certainly not make for a better environment. Other Factors Please add your comments below: I have found that Calderdale's publicity surrounding these proposals to have been somewhat limited, and lacking in ensuring complete openness, and robust attempts at consultation with the community. I have found the website difficult to negotiate, and it has on occasion died on me. Calderdale's Local Plan Position Paper reports that there is - "considerable public disquiet over the allocation of land for housing on the south side of Saddleworth Road this disquiet does not seem to be well targeted other than objections to Calderdale MBC" Yes Calderdale MBC should be our first port of call, and if there are other bodies we should - "target" it would be helpful if OUR council made us fully aware of these. I would ask that the Council seriously reviews it's future requirements for housing to ensure that the figures it first submitted are brought up to date. Accessibility Please add your comments below: Access to and from Saddleworth road is difficult. West Vale is a bottleneck, Stainland road from Saddleworth Road, meanders through some single track country roads, and at Ripponden comes out at a busy T junction. Bus services are very limited, with West Vale being the closest hub. Green Belt Please add further details below Green Belt land has been removed from Local Plan proposals in other areas due to the ribbon effect. Because this is relevant to the land at the south side of Saddleworth Road, it should also be removed, otherwise it smacks of discrimination by Planning. On Calderdale's Local Plan in November 2016 the Green Belt survey for this area came out very strongly, and stated to be a - "highly sensitive area" This Green Belt is currently serving it's purpose;- It continues to be farmland for cattle, sheep, and horses. Helps to safeguard the countryside from encroachment and the merging of neighbouring towns. Helps to emphasise urban regeneration. The infrastructure, in respect transport, highways, education, and medical, are totally inadequate for any massive development. Because there are many other areas including Brownfield sites within Calderdale which have not been considered for inclusion in the in the Local Plan, it smacks of discrimination.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU822**

Site ref (if applicable): **LP0952**

Person ID: **1243410**

Name: **Mrs Gina Walsh**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

1) The Calderdale Statement of Community Involvement 2015 states: -“We need to be very clear about what we are asking people and we must be sure that people understand what will happen as a result of this engagement. This includes being clear about what decisions have been made, what have not, and who will make the final decision.”“The proposed site is directly opposite my front door and a development on this site would have a huge impact for my family and our family life, yet to this day, I have never received a single piece of correspondence regarding this proposal, therefore lacking the clarity and involvement which the SCI calls for. With regards to the online portal, LP1625 is listed as part of Elland, which it clearly isn't. This is misleading and means it is easy for the site to be overlooked by residents who otherwise would want to state their objection. The process is far from 'simple' and is certainly not making it 'easy to get involved.' (SCI 1.3) 2) In the words of Esther McVey, Housing Minister's written policy on Green Belt land: -“Of course one of the most important environmental safeguards we have is the Green Belt. And I want to be clear that our commitment to this is as strong as ever, with any changes only happening in exceptional circumstances ; protecting the Green Belt goes beyond protection against development”“In these circumstances, our Green Belt is not being protected. In the local plan, this site is being referred to as 'green field' when it is legally classed as 'green belt' and therefore should only be built on under exceptional circumstances and 'when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including :- making effective use of suitable brownfield sites.' ( The Government White Paper -“Fixing our Broken Housing Market”“Parag 1.39) There are other suitable brownfield sites in the local area which could be used and therefore would mean the 'right houses were being built in the right places.'

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

Sound Reason:

Disproportionate amount of building in the Greetland area. As sites LP26, LP177, LP953 and LP1625 are so close in proximity they cannot be viewed individually as the overall impact of the local plan would be catastrophic to Greetland as a whole and the surrounding areas. Under the Calderdale Review of Polling Districts 2019, the number of properties per polling district is as follows: Greetland 1221, Sunnybank 505, West Vale 1119. This totals 2,845 properties. As LP0026, LP0177, LP0952 and LP1625 are all in immediate vicinity of Greetland and Sunnybank wards, combined this would see 543 additional new houses built in this distinct community on top of capacity allocated in the 2018 plan. As a percentage of the 3 wards this would see a disproportionate growth of 19% or 22.4% when adding in the 2018 site allocations. It could also be argued that the West Vale Ward is a community in itself (having its own primary school) which would take growth of Greetland and Sunnybank to 31.4% or 33.8% when including 2018 allocations. Previous potential sites which were considered and consequently rejected (report CC37) stated that it would give a "disproportionate increase to Barkisland village". The increase based on the same dataset above would have been 16.6%. which is far less than the huge potential increase of up to 33.8% in Greetland. If this plan was to be passed, surely that would show a great inconsistency in policy and legality regarding planning applications. NPPF (para 133/ 134) also states that aim of Green Belt policy is 'to prevent urban sprawl' and 'to prevent neighbouring towns merging into one another.' The location of this proposed site would go against that ; there would be less clear boundaries between Greetland and Barkisland and the distance from local amenities would become an issue. The Inspector's letter of 16 th July 2019 to the Council notes (para 14) that: ' Local plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.' The site might be 'within a 0-15 minute journey of a town centre; is within 600m of Public Open Space; and within a 15 minute journey to a GP surgery' these simple benefits are irrelevant when it takes into account that the



massive increase in traffic from the combined sites will increase travel time substantially, the local GP surgery is full and may no longer be within 15 minutes due to the increase in resulting traffic; that the majority of the public open space is actually part of the local plan to be built on; that the 'cleaner air' that Calderdale is fighting for will be heavily polluted by the increase in traffic and associated pollution from our already crumbling infrastructure. Where are the benefits? NPPF (para 94) also states: 'It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: 28 a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.' Greetland does currently have sufficient school places to meet the needs of the existing community but not for the needs of potentially 600 more families. I can clearly state that no consideration or preparation has taken place to resolve the issue of school places with the local schools and, as our immediate schools are academies, they cannot be forced to expand. The only benefits I can see are short-sighted ways of meeting council targets and lining the pockets of developers ; no benefits for the existing community or for the people who would live in these houses.

**Flood areas** The NPPF states that planning policies and decisions should promote public safety and take into account wider security and defence requirements by: ' a) anticipating and addressing possible malicious threats and natural hazards... This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area .' As stated previously, LP0026, LP0177, LP0952 and LP1625 must be viewed collectively. Although the land cited on the local plan LP0952 does not flood to the same extent as other sites mentioned, this site soaks up a huge amount of surface water presently (see photo attached) and if land above LP0952 was built on, who knows where the water will go. We should not be building on high risk flood areas, or in extremely close proximity to high risk flood areas in Calderdale. We are not like the rest of the country! We are a high risk flood area, within a high risk flood area! The news today (15/2/20) is full of stories of flooding in our area with the army currently in Calderdale trying to prevent a repeat of the devastation from Storm Ciara last weekend. Labour Council leader, Tim Swift, is urging the Government to grant Calderdale urgent assistance by recognising it as a 'Tier 1' authority getting extra funding support because it is one of a small number of areas of the country at "sustained risk" of flooding.' Not a flood risk as stated in the local plan but a flood certainty- an area which will flood repeatedly and has over the last 5 years. Additionally, the NPPF states that, ' due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere .' The council's housing targets are not area specific so houses do not need to be built in Greetland on Green Belt in high risk flood areas. Due to the topography of our area ; sloping grassland, the trees, the flat flood plains and underground springs, we are not at threat of it happening as we are already seeing localised flooding. Building houses on any of the flood plains mentioned in the local plan will only turn this into a catastrophic problem like other villages / towns in the Calder Valley are experiencing. Houses built in a high-risk flood area are not sustainable as the NPPF requires them to be. Millions of pounds are already being spent to aid flood prevention and there are numerous reports of houses /businesses not being able to get insurance due to risk of flooding. These are not the types of houses which Calderdale needs. This does not solve the housing crisis ; it just causes Calderdale more problems and costs more money.

**Conserving and enhancing the historic environment** NPPF (para 187) 'predict the likelihood that currently unidentified heritage assets, particularly sites of historical and archaeological interest, will be discovered in the future.' Combined with site LP0177 and LP1625, this area is clearly of historical importance with archaeological finds on the adjacent site (post medieval stone skull) and historical buildings on LP0177 (18 th mill). Covering these fields in concrete and houses would not only

have a negative impact on the lives of present day inhabitants but would do a disservice to the inhabitants of our past, destroying our local history irreversibly. Air pollution 'There are legal requirements and aspirational targets for levels of different air pollutants. The government recognises that protective health - and tackling air pollution - requires action, and is committed to improving the UK's air quality and reducing harmful emissions. The draft Clean Air Strategy, published in May 2018, sets out the case for action and demonstrates the government's determination to improve our air quality.' The proposed plan completely contradicts the Clean Air strategy, as the amount of land allocated on Saddleworth Road is disproportionate to the amount of land Calderdale has to allocate as a whole. The air pollution which will initially be caused during any building work and then from 600+ new houses and potentially an additional 1200 cars on the road also must take into account the pollution caused by the factories below this site in particular: Bosch Industrial Estate and Sonoco Factory. The overall air pollution will be harmfully concentrated on this one road, a road with an unusually high concentration of children so close by for so much time. This again appears to be a short term solution without really thinking about the long term impacts this will have on the health of the residents and more importantly, their children. Habitats and biodiversity To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity. 56; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation. 57; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity. 175. When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts) Living directly opposite this site, I am fully aware of how this area is full of natural diversity. I personally have heard owls, seen deer, herons, foxes, numerous birds of prey and even had a visit from a bat in the house. Although reports and assessments will be undertaken, no amount of adaptation or consideration for this wildlife would be better than simply just letting it be and not interfering. In the Calderdale Local Plan, land was removed from Stainland, which is far less sensitive, in terms of the risk development would pose to wildlife, biodiversity, habitat and landscape so if there is consistency in approach to planning, these sites should not be included in the Local Plan.

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

Duty to Co-operate Reason:

As mentioned previously, Calderdale Council have done nothing to inform residents of the local plan. It could also be argued that listing all four local sites under 'Elland' and the complex method of objection were all strategies to stop residents having their say rather than co-operating with residents.

Suggested Modifications:

Removal of all Green Belt sites (LP0026, LP0177, LP0952 and LP1625) and a revision of brownfield sites for any new and existing opportunities both in our authority and within neighbouring authorities.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5608259>

Comment ID **HRU827**

Site ref (if applicable): **LP0952**

Person ID: **1130193**

Name: **CLlr Paul Bellenger**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Air Quality. The suggested sites, listed above, earmarked for development, sit within an area of topographical challenges, an area which starts at a river level of 134m above sea level rising to 191m within a distance of 0.94 miles to one side and similar distance and height to the other, with this in mind the proposed developments would be situated within the basin of a narrow valley. Topography plays a major role in controlling the atmospheric boundary layer over complex terrains, thereby affecting the mechanisms of air pollution transport in urban valleys. The transport of air pollutants emitted from urban areas located in valleys results from the interaction between several phenomena which can include low-level temperature inversions, urban heat island (UHI) effects, the development of slope and valley winds, and different mechanisms of recirculation or stagnation of air pollutants. Different combinations of these factors can strongly influence the air pollution transport in valleys and, therefore, may lead to severe air pollution events with important implications for public health. DEFRA have already set authorities challenges to improve air quality but also reduce emissions, especially road side emissions like Nitrogen Dioxide. The creation of 600 properties within this valley bottom would contribute to increasing NO<sub>2</sub> levels, which sit around 80% at roadside and with vehicular movement at certain times of day being at a standstill or slow moving, these levels would struggle to dissipate within an acceptable time. The above factors can only be improved upon by reducing vehicular movement within the valley bottom rather than adding to it. Flood Risk The above three sites are located within a high flood risk area, an area which is a natural flood plain for the valley and which help slow the flow to areas further downstream. The removal of these areas would certainly increase flood risk to areas which at the moment narrowly avoid flooding. Our climate has seen such a change that the valleys within Calderdale are more at risk than ever and has now put us as an authority to call on government to provide extra funding to help protect us against the loss of properties, businesses and potentially lives. Allowing development within high risk flood plains would be a contradiction to something we are trying to prevent. of the NPPF states that, inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. Transport and Congestion The B6114, which runs parallel to the proposed development sites, currently, has poor transport links to other parts of Calderdale, this route currently has one bus per hour, this is due to the route being classed as semi-rural and infrequently used by residents, this route is not financially viable to bus operators and therefore limited to the one per hour. The lack of public transport comes at a cost to the environment as this sees increased vehicle numbers to the B6114, this road connects to the B6112 via a 4 ways traffic light system. Both roads become heavily congested between the hours of 7.30 am to 9.30 am and again between the hours of 3.30pm and 6pm which can sometimes see vehicles take anywhere between 20 to 40 minutes to navigate through the traffic light system. A contributing factor to this is caused from the nearby M62 motorway when diversions are in place or congestion around Junction 23. A further 600 properties could potentially add an extra 1200 vehicles to the area and the possibility of around 2400 extra journeys per day to what is already a congested road network. Infrastructure The infrastructure to this area is already experiencing issues, issues such as lack of school places, waiting lists to NHS surgeries, Low water pressure, poor gas supply and again poor public transport links, all of which are classed as critical infrastructure. Ecology, Biodiversity and conserving the natural environment. Ecology enriches our world and is crucial for

human wellbeing and prosperity. It provides new knowledge of the interdependence between people and nature, maintaining clean air and water, and sustaining biodiversity in a changing climate. The area allocated is set within a wildlife corridor which has a rich and self-sustaining eco system, a system which provides a natural habitat for Foxes, Deer, Bats, Rabbits, Kingfishers, plus many other wildlife which thrive in this unspoilt area of land which runs alongside the water course that helps sustain the ecology of this land.

**Sustainability** We risk building-in obsolescence, leaving a legacy of a built environment that does not fulfil its promise and fails to address demographic, climatic and socio-technological changes. The below paragraph is taken from the NPPF. Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. With the above in mind, a more balanced approach to our economic growth needs to be sought and one which doesn't destroy areas of sensitive land which provides such diverse benefits to a community and ecological system. There are many other locations within Calderdale which were identified as potential development sites for the local plan, however these were not seen favourable by development companies due to the type of land, i.e Brownfield, but also location, as properties developed within these areas wouldn't command the high prices which developers prefer. As Calderdale council now has its own development company (WEAVE Homes) we can now develop affordable housing on sites which national development companies are reluctant to use, sites which have either been for housing in the past or sites which are less sensitive. The benefits of having Weave homes allows us as an authority the flexibility to build for our housing needs and not pressured into releasing valuable Greenbelt land to developers for their own needs. The below quote was taken from our potential sites considered and rejected document where 21 other sites were identified, many of which have less sensitive issues to the ones I am objecting to here, the main difference was that, no developer on board, was within the rejection reasons. Given the need to demonstrate housing development is achievable where there is evidence land owners are willing to develop, including where agents/developers are actively promoting a site, is relevant; This is putting us at the hands of developers rather than having control over what we need building and where it is built. With considerate planning the number of homes built by ourselves could see 2 or even 3 properties built within the same land size as a 4 to 5 bedroom detached property which we normally see many developers aim for on land mentioned in my above statement. The above puts us in a strong position and should be fully taken advantage of before we consider the use of Greenbelt for the 600 properties proposed in Greetland I also wish to speak at the forthcoming hearing.

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

Duty to Co-operate Reason:

The process in which to put forward comments is difficult to navigate and therefore can be off putting for people to comment, i have already raised this concern.

Suggested Modifications:

. Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development

Comments:

Additional Evidence Link:

Comment ID **HRU833**

Site ref (if applicable): **LP0952**

Person ID: **1243415**

Name: **Mr Paul Sutcliffe**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I don't believe building on 'flood plains' can be classed as legal full stop! Please refer to Calderdale's Statement of Community Involvement, which has not been followed in this process. CMBC have already stated "These sites lies within the approved Green Belt. The proposed development does not meet the exceptions, as it does not preserve openness and conflicts with the purpose of including land in the Green Belt. As such, it represents inappropriate development in the Green Belt, which is, by definition, harmful. No very special circumstances have been demonstrated to clearly outweigh the harm caused by the development. It is therefore considered that the proposal would be contrary to NPPF Chapter 13 (Protecting Green Belt Land)"

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

Sound Reason:

LP0026, LP0177, LP0952 and LP1625 are so close in proximity that they should be viewed jointly as well as individually. They are all in the Greetland ward so why have they been recorded on this plan as Elland. Main points of objection 1: Flooding 2: Loss of green belt and impact on wildlife corridor 3: Air Pollution and Traffic 4: Infrastructure 5: Urban sprawl Flooding We have seen first-hand the devastation caused by the recent floods (Boxing Day 2015 and 8 th -9 th February 2020). Every proposed site flooded. The upland sites LP0026, LP0952 and LP0952 were rivers, the land already saturated by the vast amounts of natural springs this area has. The lower level part of LP0177 was indistinguishable from the river. The flood plains that these sites provide are critical and flood regularly ; soaking up excess water at times of rainfall, allowing space for the water to flow and be stored on open land in times of flood, even after the river has burst its bank, and protecting land further downstream from potential flooding. The development of this land will increase flood risk further downstream towards Westvale, Elland and Brighouse (Evidence of which can already be seen on Social media sites, Calendar and national news outlets). To develop on these sites would contradict the DEFRA plan and the NPPF. The DEFRA 25year plan states that "National flood management involves the use of a variety of measures including storing water on open land". NPPF 14 (157b) states that plans should work to safeguard land from development that is required or likely to be required for current and future flood management. The current policy and legislation on flooding states - "due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere. Chapter 14, paragraph 163 of the NPPF states: -" When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere It is abundantly clear that any development on these sites would directly oppose all these pieces of legislation and policies and would hugely increase the risk of flooding to both surrounding properties and the wider community in Greetland, West Vale and even as far as Elland. Any development of these sites and reduction in the capacity of these flood plains will only ensure that the flooding we now see will be more frequent and cause even more damage. This is not acceptable or fair therefore these sites should be removed from the local plan. Loss of Green Belt and Wildlife Corridor Calderdale's Green Belt Review map of 2020 clearly shows that all proposed sites in the Greetland ward are 'Most Sensitive Green Belt Parcels'! Does this mean the council disregards its own statements? Esther McVey, our current Housing Minister's written policy on Green Belt

land states "protecting the Green Belt goes beyond protection against development" NPPF chapter 13 states that there are 5 purposes to green belt land- CMBC has already stated that this land strongly fulfils these 5 purposes. NPPF ch13 paragraph 143 states "Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances". Protecting the green belt is very important. To include these sites in the local plan goes against all the above policies and there is no evidence of any special circumstances to support development on this land. The sites are a wildlife habitat for many different species. CMBC has already stated that a constraint is that Black Brook running through LP0177 is a UK BAP priority habitat. NPPF Chapter 15 states that planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes and sites of biodiversity. It also states - to protect and enhance biodiversity and geodiversity, plans should: identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including wildlife corridors. Developing these sites will put this precious wildlife corridor and all its inhabitants at great risk directly opposing the NPPF legislation and the DEFRA 25 Year Plan. This site should therefore be removed from the local plan Air Pollution and Traffic Congestion Air pollution and traffic congestion obviously go hand in hand. The junction of Saddleworth Road and Stainland Road in West Vale is already a bottle neck and far too congested and unable to cope with the traffic volume that passes through it on a daily basis. WSP Parsons Brinckerhoff Report on this Transport Network identifies that traffic congestion at the juncture of Stainland Road-Saddleworth Road would increase by approximately 105% traffic congestion at the juncture of Stainland Road-Rochdale Road would increase by over 100% Public Health England (PHE) (11th March 2019) reports that air pollution is the biggest environmental threat to health in the UK, with between 28,000 and 36,000 deaths a year attributed to long-term exposure. There is strong evidence that air pollution causes the development of coronary heart disease, stroke, respiratory disease and lung cancer, and exacerbates asthma. Professor Paul Cosford, Director of Health Protection and Medical Director at PHE, said: "Now is our opportunity to create a clean air generation of children Key interventions local authorities can take include redesigning cities so people aren't so close to highly polluting roads." Professor Cosford said: We recommend that at a local level, any new policy or programme of work which affects air pollution should aim to deliver an overall benefit to the public's health. Greetland School and Sunnybank Pre School are right on Saddleworth Road at the boundary of LP0177. The increase in traffic of over 100% and therefore pollution, that will be an outcome of development on this site ignores all the recommendations of PHE and put many people's health at risk especially that of our children which is totally unacceptable. Infrastructure Greetland Primary Academy, West Vale Primary School and Brooksbank High School are all full. With a proposed 600 houses, using Calderdale MBC's figure for school places of .36 per household (IDP section 9.14) this indicates another 206 school places would be needed. Where are these places to be found? Local Dentist has a waiting list of 600 for NHS places. The nearest NHS dentist was recently found (July 2019) 11 miles away in Kirklees. Local GP surgeries are already full. No plans have been put in place to cope with the expected population rise. Waiting times can already go beyond seven days and GP's are already pushed to 'breaking point'. Urban Sprawl The following is from Calderdale Councils website regarding green belt land and urban sprawl: 'Green Belt - The functions of the Green Belt are to: check the unrestricted sprawl of large built-up areas; prevent neighbouring towns from merging into one another; assist in safeguarding the countryside from encroachment; preserve the setting and special character of historic towns; and assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. At what point do you stop building and filling in the gaps? Is the future name of our area going to be called BRIGELLWESTVALEGREETBARKISLAND?

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

Duty to Co-operate Reason:

There are so many constraints and negatives to all these sites that cannot be adequately mitigated against. To develop these sites opposes so many policies, recommendations and pieces of legislation which CMBC

appear to have given little or no consideration to. I respectfully ask that these sites are removed from the Local Plan. They should never have been included as they are completely unsuitable for numerous reasons. Modifications All these sites should be removed from Calderdale plans and be replaced with potential brown field sites in accordance with government policy.

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5608293>

Comment ID **HRU839**

Site ref (if applicable): **LP0952**

Person ID: **1242261**

Name: **Mrs Yvonne Lovatt**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Local residents received no information or contact from Calderdale Council regarding these proposed developments. It is extremely difficult to comment on the website. Why does Greetland come under Elland on the website??? Greetland is not in Elland we are a separate village.

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

Sound Reason:

FLOODING -The area is of high risk.It is flooded now.On the protest walk on Sunday 16th February on some parts of the proposed land we were up to our knees in water.Lots of photos and videos have been submitted to show how flooded the sites were. Drains and Sewers are often overflowing and burst. All these proposed sites have natural springs flowing down them which could cause damage to any new development. GREENBELT -All the sites are greenbelt and should be protected.They are vital to our health and wellbeing.They are used by walkers. The land is also home to many different species of wildlife foxes deer hedgehogs rabbits bats kestrels and owls are regularly seen on the sites.Alot of these are protected.Their habitats should not be disturbed. INFRASTRUCTURE -The proposed development is disproportionate to the size of the village.Greetland is not a town.This development would cause urban sprawl. All the local schools are full,Dentist and doctors have long waiting list Saddleworth Road already is unable to cope with traffic now.Traffic is regularly stacked back to the school this causes a lot of air pollution to the residents especially the children at the school,Another 1200 cars to use this road will make the traffic much worse.The traffic lights at West Vale are not fit for purpose.

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

Duty to Co-operate Reason:

A quote from the first minister of Wales on BBC1 news today the 20/02/2020 states There are rigorous planning laws in place and local authorities should not be building on flood planes. Site no"s LP0026 LP0177 LP0952 and LP1625 are flood planes and should be removed from the planning frame work!!!!

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU842**

Site ref (if applicable): **LP0952**

Person ID: **1128728**

Name: **Mr Vladimir Murawa**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Calderdale have exhibited a complete lack of consultation prior to formulating and submitting their LP to the Inspector. The LP completely disregards NPPF Section 13 Protecting Green Belt Land Paragraph 80.

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

Sound Reason:

The Local Plan is flawed in respect of the following;- Flooding Highways Ecology Open Space Historic Environment Employment Land Study Business and Economy Environmental Health Other factors Accessibility Green Belt Flooding Because of the many natural springs, together with the direct rainfall, the Saddleworth Road area is subject to flooding. Currently the Green Belt and it's trees south of Saddleworth Road absorb much of the excess water, but the lower fields are class 3 flood plains. If the areas south of Saddleworth Road have the massive development outlined in the Local Plan, filling the whole south side, the consequences for West Vale in terms of flooding are dire, as it will all flow down the valley, whatever drainage system might be planned. Calderdale is well aware of the effects of extreme weather in our area. Sewer Flooding The sewers that runs close in the Black Brook and down Saddleworth Road are already overloaded with combined sewer overflows (CSO) that discharge excess flows into the brook at time of rainfall. The proposed developments will more than double the number of houses connected to these sewer systems. These additional foul flows will almost double the flood volumes on the sewers and nearly double the annual spill volumes from the CSOs which will increase the pollution to the brook. This will have a negative impact on the fish and wildlife in the area. The Environment Agency have a no deterioration policy for CSOs but there are no plans to upgrade the sewer system in Greetland and West Vale to negate this impact. Highways Saddleworth Road carries a number of various speed restrictions along it's length. Varying from 20 mph to 50 mph. Traffic at peak times can often be stationary, and speeding within the 30 mph zones is regularly observed. Fatalities and other serious accidents do occur in Saddleworth Road. The proposal for in excess of six hundred homes in Saddleworth Road, and the planned two cars per household, the additional traffic volume would be horrendous. Limited prospects for employment in the immediate area would mean that the two cars per new household would be travelling through Saddleworth Road at peak times to and from their places of work in either Leeds or Manchester, with no economic benefit to Calderdale. However the effects on the pollution level would be horrendous. Because the local schools would not have the capacity for a further one thousand (approximately) children, would this then mean additional travelling from Saddleworth Road to more distant schools? West Vale is currently a serious bottleneck. Whatever plan is devised to try to alleviate traffic congestion, roads from four directions converge into West Vale, and the massive development proposed will only create a far greater problem. Ecology I believe that the ecology of the area is reasonably - "balanced" - The valley enjoys the presence of all manner of wildlife including herons, squirrels, foxes, and other wildlife, who share the area, to the benefit of residents. Open Space Open Space preservation is necessary for the



following reasons; To continue to support farming, existing fauna and flora of the area. Allow locals and visitors to enjoy the open spaces, namely walkers, cyclist, horse riders, and many others. Open Spaces offer mental and physical wellbeing, dilute pollution, and allow vital recreation and exercise. Once Green Belt/Open Space is lost it can never be returned. Surely we do not wish to deprive the next generation of what little Open Space we have remaining. A great swathe of Saddleworth Road has already been over developed, particularly on the north side. The area has already had a disproportionate level of building for its size. To turn the whole valley into a housing estate would be a travesty. Efforts should be made to fulfil the housing requirements with brownfield development. The existing green belt should be allowed to remain. Historic Environment The changes to the local areas environment had changed dramatically, and some of the area's historic past has been eroded by the mass urbanisation in the area. We need to preserve what little remains. Employment Land Study The area of Greetland does not have any prospects for meaningful additional employment, meaning new residents would have to travel to places of employment, adding to traffic and pollution problems. Business and Economy Because the area is predominantly agricultural and domestic dwellings, the addition of massive housing development will not change the business prospects or economy of the area. Environmental Health One definition of Environmental Health is -“ Environmental health is focused on the natural and built environments for the benefit of human health, whereas environmental protection is concerned with protecting the natural environment for the benefit of human health and the ecosystem ”. Environmental health and environmental protection are very much related” The loss of Green Belt, Open Space together with the addition of possibly 2000 more domestic vehicles, to enable travel to places of employment, education, or social and pleasure, outside the immediate area, would certainly not make for a better protected environment. Other Factors Other factors I would ask to be considered are; I have found that Calderdale's publicity surrounding their Local Plan proposals to have been very limited, giving the appearance of an absence of complete openness. I do not believe the attempts at consultation with the community have adequate or thorough. Unlike the previous website comments procedure, I have found the website difficult to navigate much less reliable, making it difficult to register comments. Calderdale's Local Plan Position Paper reported that there is -“considerable public disquiet over the allocation of land for housing on the south side of Saddleworth Road this disquiet does not seem to be well targeted other than objections to Calderdale MBC” Calderdale has also received petitions from the residents of Greetland pointing out their dismay and objections to the initial Local Plan. Perhaps it might be prudent for the Council to review it's more current housing requirements, as a result of changes in national and international situations, together with a brownfield site in West Vale and other areas in Calderdale now becoming available for development. Because the same problems and arguments apply, I would like to add designated areas LP1625, LP0177, LP0026, and LP1407 to my objections. Considering all the areas designated in the current Local Plan for Saddleworth Road, together with the existing development over a long number of years, it would suggest that Saddleworth Road, Greetland appears to have been unreasonably discriminated against, when comparing the areas size for the vast amount of development. The development of brownfield sites should be a priority according to the CPRE, there are more than enough brownfield sites to fulfil the requirements without encroaching into Green Belt. Accessibility Access to and from Saddleworth road is difficult. West Vale is a bottleneck, as roads from four directions merge. Stainland road from Saddleworth Road, meanders through some single track country roads, and at Ripponden comes out at a busy T junction. The road is well used by HGVs, servicing Bosch in the valley, Sonoco, and quarries. Bus services are very limited, with West Vale being the closest hub to regular bus services. Green Belt NPPF Section 13 Protecting Green Belt Land Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: 1) to check the unrestricted sprawl of large built-up areas (2) to prevent neighbouring towns merging into one another (3) to assist in safeguarding the countryside from encroachment (4) to preserve the setting and special character of historic towns (5) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Calderdale Council, in its own evidence, concludes that this area of Green Belt performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also

performs strongly. The development of the land would be against all five functions of Green Belt. Esther McVey's (former Housing Minister up to Nov 2019) written policy on Green Belt land quotes:: "protecting the Green Belt goes beyond protection against development" The limited area of Green Belt remaining in Greetland should be retained because; Green Belt land has been removed from Local Plan proposals in other areas due to the ribbon effect. Because this is relevant to the land at the south side of Saddleworth Road, it should also be removed, otherwise it smacks of discrimination by Planning. On Calderdale's Local Plan in November 2016 the Green Belt survey for this area came out very strongly, and stated to be a - "highly sensitive area" It continues to be farmland for cattle, sheep, and horses. Helps to safeguard the countryside from encroachment and the merging of neighbouring towns. Helps to emphasise urban regeneration. Additional comments In regards to highways, education, transport and medical, the facilities are totally inadequate to be able to sustain any massive development. Much of the Green Belt in the Greetland area has already been consumed by housing development over the years, to a disproportionate degree. Work by CPRE suggests that there are enough brownfield sites in Yorkshire and Humberside to keep councils going for 89 years to meet their 5 year housing targets. It would appear that population growth is likely to be amended substantially downward in view of recent European events. The Local Authority should seriously look again at other possibilities. Alternative proposed use for this site. To remain as Green Belt and open space.

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

Duty to Co-operate Reason:

Suggested Modifications:

The Green Belt at Saddleworth Road HX4 should be retained as Green Belt.

Comments:

Additional Evidence Link:

Comment ID **HRU848**

Site ref (if applicable):

Person ID: **960062**

Name: **Mr Dean McIntyre**

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 previously submitted my concerns regarding the proposed residential developments on the Saddleworth Road, Greetland area when these were initially proposed. Due to living locally, I am concerned at the scale of the proposed developments and the impact that this would have on the local area. I do accept however that there is a requirement for housing as we move forward and that the Greetland area will have to have some further development. I believe that the proposed developments taken together are too much for this area based upon the following. As such I object against each proposal especially when taken as a whole. I accept that smaller scale development in the area as well as other areas in Calderdale is required, but

more importantly is sustainable. Less than 150 houses in this area would be a more sustainable. Again the rest spread throughout the District would have less impact throughout the District. My objections regarding some of the proposed developments are similar. The main issue is the scale of development in this corridor. The impact of proposals LP0177(200), LP0952 (246), LP0026 (67) and LP1625(30) which would mean 543 houses being built in the Saddleworth Road corridor would have a significant impact on the amenities in the area as per the below.

**Traffic Congestion** - The junctions of Saddleworth Road, Greetland and Rochdale Road, Greetland where they join Stainland Road, are already congested on a daily basis especially at rush hour. The impact of over 540 houses would be significant. Taking into account, most households have two cars, this would mean over 1000 more cars in this already congested area. This would mean increased traffic at the junctions of Saddleworth Road and Stainland Road, and Stainland Road and Rochdale Road. An increase of 105% and 100 % respectively according to the plan proposals. With this will come increased air pollution and potential increase danger to pedestrians based upon the increase in traffic on Saddleworth Road. Other side roads will be used as –“rat runs” i.e. Sunnybank Drive / Sunnybank Road to Rochdale Road and Brian Royd Lane to Rochdale Road when Saddleworth Road becomes too congested, which will be a daily occurrence if these houses were built.

**Schools** ; A significant expansion of the Greetland Academy would be required to meet the new demand. Based upon the proposals the number of new pupils would be significant. I would suggest the main school site on School Street cannot be extended much more, which would impact on the Saddleworth Road annex. There is room for school expansion here, but parking is already an issue and would be significantly worse with school expansion. More housing means more children, means bigger schools on limited sites and means more parking issues in both areas. This also means an increased danger to children and residents through inconsiderate parking and driving and using Sunnybank Drive/Sunnybank Road and Brian Royd Lane as a cut through to both schools.

**Environmental / Flood plain issues** ; Site LP 0177 is proposed on a flood plain area. On 9/2/20 the river again broken its bank and the fields are flooding again. Second time in at least 5 years! I have video footage of the significant flooding to this area. This is not a once in a lifetime occurrence, but a now regular occurrence. Site LP 0952 and site LP 1625 on the plans states that these proposed areas are subject to flooding from surface water. I simply cannot understand the logic behind proposals to build houses on areas susceptible to regular flooding. Calderdale is one of the hilliest areas in Yorkshire, so why would there be a proposal to build new houses on a flood plain area and in areas susceptible to excessive surface water issues when there are many other areas within the District that are not susceptible to this and which are not on a flood plain? The cost of the previous flooding and the now recent floods will run into millions for the council and residents.

**Environmental Factors** - Part of the development plan states that environmental protection is a major consideration. I would suggest that development on the scale proposed and in the three areas LP 0952, LP 0177 and LP 1625 would have a significant impact on the local environment and take away the local countryside from local residents. LP 0177 and LP 0952 are wildlife habitats with the latter also being an area of deciduous woodland. LP 0177 and LP 1635 are also archaeological sites of interest.

**Crime** ; At the present time, the Greetland, West Vale and Stainland area is a safe area to live. Crime is relatively low compared to other areas within Calderdale. The addition of over 500 new houses is likely to increase in the local area, which at the present time is relatively low in Calderdale. Such significant developments would attract criminals, both local criminals and travelling criminals.

**Amenities** - Doctors surgeries will be affected with the large increase in patients. Accepting this may expand, I believe that this will still be negative in impact and may not be able to expand to take the increase in people. The impact on local people would be negative. I believe that the surgery is excellent at present and you can access services if required.

**Other factors** ; Green Belt and Housing developers interested ; I have read the rationale as to why some of the previous proposed sites have now been shelved for development. Of note, factors highlighted on most are that they are on green belt sites and that there are no proposed developers interested. Interesting. The proposals in this area are on green belt land and I suspect that money is a factor as to why these areas have yet again been brought back to the table. Greetland is a sought after area, hence the reason why developers would jump at the chance of building houses in this area (more profit), and the council will receive more revenue based upon the housing

bands. I am not naive and nor are other people, but this is a concerning factor for myself and no doubt other residents. Is money a factor as to why these proposals have been reinstated, not benefit to the area?

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU880**

Site ref (if applicable): **LP0952**

Person ID: **1243517**

Name: **Mr Andrew Mandebura**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Calderdale Council have failed to make the residents aware of the need to submit new objections to the updated Local Plan and the timescales for this. Calderdale Council has a responsibility to rectify this and ensure this is done in a fair, open, honest and transparent way.

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

Sound Reason:

Infrastructure Section 4.18 of the Cabinet report of 14 October 2019 - "Potential modifications to the draft Local Plan following the receipt of the Planning Inspector's post-stage 1 hearings letter" quotes: - "Exceptional circumstances must be demonstrated to justify the release of land from the Green Belt. Furthermore, careful consideration needs to be given to sites in the Green Belt to ensure that they support sustainable development. In this respect key considerations include the extent which the site would be accessible to existing public and active travel modes, and whether the development would be of sufficient scale to support the delivery of new infrastructure and comprehensive masterplanning." There is currently one bus service, the 343, operated hourly by Yorkshire Tiger which passes along Saddleworth Road and into West Vale. This is invariably a small single decker bus and does not provide a sufficient public transport solution in line with the proposals above. In addition, the current junction in West Vale between Saddleworth and Stainland roads does not adequately handle the current volume of traffic at peak times. This results in long waiting times which will only increase with an increase of additional housing. No changes to infrastructure in this regard have been proposed to handle the additional traffic and this junction will not benefit from the A629 development project. Therefore, I would assert that the neither does this plan support sustainable development or indicate comprehensive masterplanning. Finally, according to Council data on primary school admissions 60 places were allocated to new starters at The Greetland Academy in 2019/20. 33 of these were awarded on distance while 26 were awarded on the basis of siblings already at the school. If the planned admissions are also taken into account at Norland (15), West Vale (26) and Barkisland (30); this brings the total number of new primary school places within

the range of the new development to 131. At this stage it has not been detailed how school infrastructure will be developed to cope with existing requirements in addition to the new development which will fall in this catchment area. Once again an indication of a lack of comprehensive masterplanning. As academies West Vale and Greetland are also not bound by the council to expand. Flooding The recent heavy rains brought by Storm Ciara and Storm Dennis have flooded the land proposed for development. Paragraph 149 of the National Planning Policy Framework 2019 states that -“Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk (p.46) and also states in paragraph 150 that new developments should -“avoid increased vulnerability to the range of impacts arising from climate change” The plans as detailed have no reference to the mitigation of flood risk which has shown to be a significant danger as they lie in an area assessed by the Environment Agency to be -“High Risk” Flooding areas - <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map?easting=408233&northing=421102> The removal of soil and land which absorbs water to be replaced by concrete and tarmac is likely to exacerbate this issue. Air Pollution As alluded to above. The increased congestion from possibly 1200 additional commuters will lead to a deterioration in the air quality. This will be compounded by the removal of trees for the development. In addition, this decrease in air quality will be right next to a primary school housing young children causing health issues which are well documented such as asthma.

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

Duty to Co-operate Reason:

Given that the Section 110 of the Localism Act sets out the 'duty to co-operate' as sustainable development or use of land that would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a county council requires that councils set out planning policies to address such issues requires that councils and public bodies 'engage constructively, actively and on an ongoing basis' to develop strategic policies requires councils to consider joint approaches to plan making requires that councils and public bodies 'engage constructively, actively and on an ongoing basis' to develop strategic policies I can see no demonstration of a 'duty to co-operate' as this plan does not take into account the issues of school places, traffic congestion and management, environmental issues around flooding and air pollution and their impact. I can see no evidence from the proposals that these have been considered. Also, the economic requirements for the plan have not been reviewed since 2018. During which time inflation has been increasing on average at 2% while wages have stagnated. The economic forecast is therefore outdated and does not represent an ongoing basis of strategic review.

Suggested Modifications:

1. A clear assesment of the impact of additional traffic on current infrastructure and the environment relating to air pollution and the cost of development required to keep traffic congestion at current levels.
2. A robust assesment of the danger of building on a flood plain categorised as high risk by the environment agency and the cost of development to safeguard against flooding.

Comments:

Additional Evidence Link:

Comment ID **HRU895**

Site ref (if applicable): **LP0952**

Person ID: **1242153**

Name: **Mrs Samantha Connett**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

No the proposal for the site fails to acknowledge many planning guidelines/ advice given on environmental and social factors. Upon reading the national policy planning framework, I have found many points that contradict what the council is trying to enforce, the main one I believe is below. Proposals affecting the Green Belt Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are: a) buildings for agriculture and forestry; b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it; c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces; e) limited in filling in villages; f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: "" not have a greater impact on the openness of the Green Belt than the existing development; or "" not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority. The council also failed to make the most affected people aware that these sites have been added back into the local plan when they were removed in 2017. Most people have only found out through social media and word of mouth, many residents who aren't on social media won't be aware of this.

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

Sound Reason:

No Flooding -This site is completely unsuitable for development. It is well known for flooding as it naturally takes all the water that flows from the higher parts of Greetland as well as a large amount of unground springs, seen by myself a week after the floods from storm Ciara on 09/02/2020. The level of devastation caused by this storm in the Calder Valley is only going to become more frequent as we face the battle of climate change, to build houses on such volatile land is completely unthinkable, If this land was developed the risk of the flooding would be devastating as the water usually soaked up by this land would be diverted elsewhere. Over thirty million pounds has so far been spent on flood defences in Calderdale, but as we face the threat from storm Dennis the Army had been called in to help protect us from flood water, but yet the council still wants to build on natural flood plains. Flooding cannot be mitigated against in this area. The land as it stands is helping to prevent further disaster, and must be left as it is to prevent further damage to or homes and community. To risk the homes and livelihoods of the community, when the community is so opposed to it is wrong as it is us who would suffer and end up having to pick up the pieces of our lives when, not if we're left with the repercussions of this development. The proposal does not meet national policy with regards to flooding. The NPPF states in paragraph 155 that "Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere". The recent floods we had on

09/02/2020 only strengthen my point. I will add evidence of the floods on this plot of land below. We are forever having interruption on our roads by the council having to do repairs on the water system, the water going into these as a result of the flood plain being destroyed would put even more pressure on this, leading to more roadworks and more road congestion. Clean Air Policy ; The quantity of houses proposed on this site would mean far greater emissions and air pollution in west vale, the traffic at the 2 sets of crossroads in west vale which nearly all driving residents of Greetland will use at least twice daily is stand still traffic at the best of times. the amount of cars this development would bring would only make this worse and drive up the pollutants in the air. Calderdale Council have declared a climate emergency, so how is it a justifiable decision to release greenbelt land and destroying the natural benefits that it brings. There are many more suited brownfield sites within Calderdale that could be used instead. The Green Belt - Loss of large area of Green Belt The NPPF states that para When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused on these grounds alone this site should be removed from the local plan. Taking away something so natural and therapeutic that benefits local people by getting in touch with nature and to get children out into open spaces should be the last resort and with so many brownfield sites still available I believe this goes against many of the policies on the NPPF. A report recently submitted to the Adult Health & Social Care Scrutiny Board stating the need to retain Green Spaces for the Health and Wellbeing of Calderdale residents. This report was submitted by the Head of Planning. (This report is on Calderdale MBC's Website)

Infrastructure - the roads in and around Greetland are at breaking point on a good day, let alone when we have endless amounts of roadworks to contend with. the roads simply cannot take the proposed number of cars which all of these houses would bring with them. Both The Greetland Academy and West Vale Primary are full to capacity, as well as the feeder high school Brooksbank. Stainland Road Medical Centre would also struggle to attend to the additional patients this would bring with it, the local dentist has a 600 place waiting list for NHS patients. This development along with the others proposed is an unsustainable amount for Greetland because of this. Allocation of land - Greetland is a village. So why is it included in with Elland in the local plan? Ripponden and Brighouse haven't been grouped. I believe this to be a deliberate attempt to mask the disproportionate quantity of building works being allocated to Greetland. while other wards have no sites added to the local plan. I believe this to be an unsustainable amount for this village, put that together with them all on one road and it's unbelievable . LP0026, LP0177, LP0952 and LP1625 are all on Saddleworth Road. Greetland is a community in its own right and when shown the amount of planned build in this one small area it is unacceptable. Greetland is HX4 and a village whereas Elland is HX5 and a town, we shouldn't be grouped together. Urban Sprawl - can cause increased traffic, worsening air and drinking water, threats to groundwater supplies, high rates of polluted runoff and increased flooding. The flooding on 09/02/2020 shows we don't need anymore reason to chance risking more flooding in our area.

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

Duty to Co-operate Reason:

There is no exceptional circumstances that justify destroying the greenbelt land when brownfield sites still remain untouched. It does not conform to Central Government Policy and does not conform with current legislation with regard to building in flood risk areas.

Suggested Modifications:

This amount of development is unsustainable for Greetland in every way possible, I find it hard to believe someone has put it together. It's also on Greenbelt. this is what it should remain for the future generations of Calderdale to enjoy. The sites LP0026, LP0177, LP0952 and LP1625 should be removed from the local plan

Comments:

Additional Evidence Link:

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Comment ID **HRU898**

Site ref (if applicable): **LP0952**

Person ID: **1243139**

Name: **Mrs Margaret Pollard**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Failure to consult sufficiently with the residents of Greetland on the inclusion of these parcels of land within the plan. The plan has been in development since 2016, some 3 years. The inclusion of these parcels of land has been in within the last three months, this feels a very extremely disproportionate timescale.

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

Sound Reason:

Loss of Greenbelt The development of this site will not only lead to the loss of a greenfield site but also Greenbelt. Calderdale Council classified this area of the Greenbelt as being -“most sensitive Green Belt parcel” within the last local plan but is now willing to sacrifice it for future generations to build houses. The Councils website indicating that this site is most sensitive Green Belt, doesn't that mean it should be preserved at all cost? Paragraphs 145 of the NPPF states the local planning authority should regard the construction of new buildings as inappropriate in the Greenbelt with certain exceptions. I don't believe that the criteria set out for exceptions would be met meaning that development should not be allowed. The likely development which will take place on this land will be large 3 and 4 bedroomed executive development to satisfy the needs of those commuting to near by Manchester and Leeds, they will not satisfy the local needs nor would they meet the test of affordable. The test set out in sub paragraph g) relates to limited infilling or the partial or complete redevelopment of previously developed land. The development of this size would not fulfil these points and therefore are not exceptions and should not be permitted. Subsection e) relates to limited infilling of villages, the inclusion of this land within the plan for housing development would substantially add to the village of Greetland and therefore does not meet this exception. Paragraph 136 of the NPPF indicates that the boundary of the Greenbelt should only be changed in exceptional circumstances. Does the development of this size meet the criteria of exceptional circumstance? What are the exceptional circumstances that would warrant the loss of most sensitive Greenbelt parcel that would cause loss of openness of the Greenbelt to the other residents of Greetland. The purpose of the Greenbelt is to preserve the countryside. We have a duty to our future generations to preserve the openness of our countryside as much as possible and therefore this site should be removed from the plan. Unfortunately, when it has gone there will be no way of replacing it, future generations will not be able to enjoy the abundance of wildlife, its openness and recreational activities as we have. In Richard Seaman's letter of the 18/10/19, he indicates that the Councils approach to meeting housing needs is to release Green Belt; however, this is tempered by placing a stronger emphasis on regeneration of brown field sites and increasing densities on such sites. He fails to indicate where these sites are and what they will do to ensure that this is completed first. I would question however if this is the stance, why the Council isn't approving a housing development on such a brownfield sites such as the one in the West Vale when a planning application has been made and removing this housing allocation from Green Belt within the



proposed plan? Prior to the release of any Greenbelt the Council should engage in filling all unoccupied houses and releasing brownfield sites for housing development. Of course, I appreciate that these sites are more expensive to develop and what every developer wants is to build on a greenfield site, this should not however be at the expense of loosing Greenbelt, we must protect it and preserve it for future generations.

Ground Conditions and pollution This site is adjacent to an industry development. Paragraph 182 states that existing businesses should not have unreasonable restrictions placed on them as a result of the development. Environmental Health have indicated that they have reservations regarding the development of this land due to its close locality to industry. The development of this site could impede the future development of this industrial site and could also subject residents to noise and/or air pollution. I have had personal experience as an environmental practitioner of investigating noise pollution from this site in the past . Infrastructure Local Road Network ; (Sites LP0177, LP1625, LP0952 and LP0026 should be considered together) Traffic from the site would generate considerable vehicles movements on Saddleworth Road into West Vale. The junction of Saddleworth Road/Stainland Road in West Vale is already heavily congested, the addition of any traffic movements from this site would only add to this congestion. The site summary indicates that mitigation measures will be required at this junction, shouldn't these mitigation measures be identified before the inclusion of the site within the plan? What if they can't be undertaken due to constraints at the junction? Paragraph 102 of the LPPF indicates that transport issues should be considered from the earliest stages of plan making, I therefore request that this be considered now and that if the junction is not capable of dealing with an additional 2000+ car movements per day that the site(s) be removed from the plan. The site reports a journey time of 15 mins to the nearest town, Elland. This was obviously done via Google Maps and wasn't undertake at peak times when it can take up to half an hour to get through the above junction. Traffic can often be queuing up past the junior school on Saddleworth Road, any further additions to the volume of traffic will not only increase journey times but contribute to a lowering of air quality standards in the areas due to vehicle air pollution. Vehicle pollution is seen as one of the main contributors to respiratory ill health. Any increased journey times and /or congestion will mean that the narrow side roads will be used as -"short"cuts. Due to increased ownership of cars and school run parking, these roads are often down to single track again causing congestion and danger to pedestrians and other road users. Additional volume of traffic will exacerbate this issue. It should also be noted that the current school is a split site and many parents travel between sites using cars, any increase on these movements would add to the already dangerous conditions. Local schools, doctors and dentists are currently oversubscribed, I would therefore question if all four sites within Greetland are developed how would be these needs be fulfilled? Meeting the challenge of climate change and flooding Whilst I appreciate that this site is not within an identified flood risk area, I am concerned that the loss of open agricultural land and the replacement with roads, drive ways, hard standing and roof tops will contribute greater run off into the adjacent water courses, thereby increasing the speed of delivery and volume of water following rainfall in to these. Whilst this will not impact the site directly if will affect those downstream greatly. Boxing Day 2015 and over the weekend of 8 th /9 th February 2020, this area of Calderdale was subjected to substantial flooding. Properties in West Vale and Elland which are downstream of this development were affected. Calderdale has now been identified as a high-risk area for flooding and any loss of open land can only add to the risk identified. The Greetland hillside is riddled with springs and excessive ground water. It will be argued that this can be mitigated by adequate land drainage and SuDs however these schemes are costly and remove profitable land from any development and I would therefore question whether they would be undertaken. A recent development in Greetland of one single residential property has stopped water running in to a well that as run for the last 30 years to my knowledge and it now flows down the local roads, what would a development of this nature do?

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

Duty to Co-operate Reason:

#### Suggested Modifications:

The economic growth calculation should be reconsidered.

#### Comments:

#### Additional Evidence Link:

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Comment ID **HRU922**

Site ref (if applicable): **LP0952**

Person ID: **1243675**

Name: **Mr Christopher WALLACE**

Organisation:

Agent ID:

Name:

Organisation:

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

#### Legal Compliance Reason:

LETTER OF OBJECTION TO PROPOSED HOUSING DEVELOPMENT IN GREETLAND: SITE REF: LP0026 LP0952 LP0177 & LP1625 LOSS OF GREENBELT The NPPF states that very specific circumstances need to be met, I do not believe any circumstances have been met to justify the release of greenbelt for development. The NPPF states brownfield sites need to be identified and the council must demonstrate it has examined all other option for developments prior to the release of greenbelt! The NPPF states that the greenbelt serves to restrict the urban sprawl and safeguard the countryside. The greenbelt woodlands and meadows serve the community for the urban population to enjoy and be part of their wellbeing, nationally obesity is on the increase and the greenbelt is a place for people to exercise, de stress free of charge. The greenbelt is the natural habitats for the varied wildlife in the area. FLOODING With the increased threat of climate change due to global warming it is 100% certain development on his site would increase the risk and requirement of flooding in the area and downstream of the Calder bringing more devastation and misery for the many residents and businesses along the way. The events of December 2015 and February 2020 area perfect example no amount of mitigation can compete with this, millions of pounds have been spent on the failed flood defence scheme and will only serve to divert the problem elsewhere. This area is classed as a high risk floor area and our current Prime minister has urged councils not to release flood plains for development. During the events of February 2020 the British Army were deployed to the Calder Valley to assist with the devastation cause by flood water. INFRASTRUCTURE/POLLUTION/CONGESTION The current road system would not support any increase if the predicted volume of traffic, Saddleworth Road and the traffic lights in West Vale have no room or plans to be altered. Developments of any scale would lead to further congestion and the certainty of increase of air and noise pollution; Calderdale council currently have a clean air policy action plan!! The local plan makes no provisions for child places in all local schools that are currently oversubscribed, this will lead to further congestion an air and noise pollution by been forced to travel out of the area. The schools and care homes along with the houses that boarder Saddleworth Road would be at a increase risk of poorer air quality. Any increase in volume of traffic would certainly increase the risk of accidents particularly around the school area for children, pedestrians and other road users. HOUSING REQUIRMENTS The Greetland area has a disproportionate allocation of land compared to other areas of Calderdale where development would be more suitable for the local plan, areas where the infrastructure is in place, no risk to flooding or causing increased flooding. The local plan needs to be updated and re assessed as to identify the action needed for development as the current plan is old and out of date. Economic ground for the area is not as predicted in the current plan. No plans are in place for business development. The current plan is unsustainable.

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:

Comments:

Additional Evidence Link:

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Comment ID **HRU926**

Site ref (if applicable): **LP0952**

Person ID: **1243715**

Name: **Mr Timothy Wallace**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

LETTER OF OBJECTION TO PROPOSED HOUSING DEVELOPMENT IN GREETLAND: SITE REF: LP0026 LP0952 LP0177 & LP1625 LOSS OF GREENBELT The NPPF states that very specific circumstances need to be met, I do not believe any circumstances have been met to justify the release of greenbelt for development. The NPPF states brownfield sites need to be identified and the council must demonstrate it has examined all other option for developments prior to the release of greenbelt! The NPPF states that the greenbelt serves to restrict the urban sprawl and safeguard the countryside. The greenbelt woodlands and meadows serve the community for the urban population to enjoy and be part of their wellbeing, nationally obesity is on the increase and the greenbelt is a place for people to exercise, de stress free of charge. The greenbelt is the natural habitats for the varied wildlife in the area. FLOODING With the increased threat of climate change due to global warming it is 100% certain development on his site would increase the risk and requirement of flooding in the area and downstream of the Calder bringing more devastation and misery for the many residents and businesses along the way. The events of December 2015 and February 2020 area perfect example no amount of mitigation can compete with this, millions of pounds have been spent on the failed flood defence scheme and will only serve to divert the problem elsewhere. This area is classed as a high risk floor area and our current Prime minister has urged councils not to release flood plains for development. During the events of February 2020 the British Army were deployed to the Calder Valley to assist with the devastation cause by flood water. INFASTRUCTURE/POLLUTION/CONGESTION The current road system would not support any increase if the predicted volume of traffic, Saddleworth Road and the traffic lights in West Vale have no room or plans to be altered. Developments of any scale would lead to further congestion and the certainty of increase of air and noise pollution; Calderdale council currently have a clean air policy action plan!! The local plan makes no provisions for child places in all local schools that are currently oversubscribed, this will lead to further congestion an air and noise pollution by been forced to travel out of the area. The schools and care homes along with the houses that boarder Saddleworth Road would be at a increase risk of poorer air quality. Any increase in volume of traffic would certainly increase the risk of accidents particularly around the school area for children, pedestrians and other road users. HOUSING REQUIRMENTS The Greetland area has a disproportionate allocation of land

compared to other areas of Calderdale where development would be more suitable for the local plan, areas where the infrastructure is in place, no risk to flooding or causing increased flooding. The local plan needs to be updated and re assessed as to identify the action needed for development as the current plan is old and out of date. Economic ground for the area is not as predicted in the current plan. No plans are in place for business development. The current plan is unsustainable.

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:

Comments:

Additional Evidence Link:

Comment ID **HRU933**

Site ref (if applicable): **LP0952**

Person ID: **1243724**

Name: **Miss Timothy Wallace**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

LETTER OF OBJECTION TO PROPOSED HOUSING DEVELOPMENT IN GREETLAND: SITE REF: LP0026 LP0952 LP0177 & LP1625 LOSS OF GREENBELT The NPPF states that very specific circumstances need to be met, I do not believe any circumstances have been met to justify the release of greenbelt for development. The NPPF states brownfield sites need to be identified and the council must demonstrate it has examined all other option for developments prior to the release of greenbelt! The NPPF states that the greenbelt serves to restrict the urban sprawl and safeguard the countryside. The greenbelt woodlands and meadows serve the community for the urban population to enjoy and be part of their wellbeing, nationally obesity is on the increase and the greenbelt is a place for people to exercise, de stress free of charge. The greenbelt is the natural habitats for the varied wildlife in the area. FLOODING With the increased threat of climate change due to global warming it is 100% certain development on his site would increase the risk and requirement of flooding in the area and downstream of the Calder bringing more devastation and misery for the many residents and businesses along the way. The events of December 2015 and February 2020 area perfect example no amount of mitigation can compete with this, millions of pounds have been spent on the failed flood defence scheme and will only serve to divert the problem elsewhere. This area is classed as a high risk floor area and our current Prime minister has urged councils not to release flood plains for development. During the events of February 2020 the British Army were deployed to the Calder Valley to assist with the devastation cause by flood water. INFRASTRUCTURE/POLLUTION/CONGESTION The current road system would not support any increase if the predicted volume of traffic, Saddleworth Road and the traffic lights in West Vale have no room or plans to be altered. Developments of any scale would lead to further congestion and the certainty of increase of air and noise pollution; Calderdale council

currently have a clean air policy action plan!! The local plan makes no provisions for child places in all local schools that are currently oversubscribed, this will lead to further congestion an air and noise pollution by been forced to travel out of the area. The schools and care homes along with the houses that boarder Saddleworth Road would be at a increase risk of poorer air quality. Any increase in volume of traffic would certainly increase the risk of accidents particularly around the school area for children, pedestrians and other road users. HOUSING REQUIRMENTS The Greetland area has a disproportionate allocation of land compared to other areas of Calderdale where development would be more suitable for the local plan, areas where the infrastructure is in place, no risk to flooding or causing increased flooding. The local plan needs to be updated and re assessed as to identify the action needed for development as the current plan is old and out of date. Economic ground for the area is not as predicted in the current plan. No plans are in place for business development. The current plan is unsustainable.

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:

Comments:

Additional Evidence Link:

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Comment ID **HRU936**

Site ref (if applicable): **LP0952**

Person ID: **1243615** Name: **mrs SAMANTHA mcfadzean** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

1. There were no working party meetings ahead of the Councils Cabinet Meeting of 4th October 2019 at which the decision to increase the housing numbers was made. The local Councillours were therefore prevented from discussing the issues ahead of the cabinet meeting. 2. The local Plan does not address the implications of the National Planning Policy Framework, especially NPPF Para 177 and the associated PPG in the sustainability of Greenbelt Sites.

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

Sound Reason:

The council has failed to differentiate between housing need and requirement as it has not evidenced its economic and employment growth forecasts. It appears that the plan has a grossly disproportionate emphasis on the Greetland community, with the 600 proposed houses off Saddleworth road. This is neither fair, reasonable or a balanced share to Greetland's size. The plan would create Urban Sprawl in our area which would have many negative consequences for Residents, Local Businesses and the environment.

Such as: Traffic - We already have a traffic congestion issue on Saddleworth Road, Rochdale Road and Stainland Road at key times, this plan would just exacerbate these problems. Air Pollution - the increase in traffic will lead to an increase in air pollution, particularly affecting the elderly and young children, the latter of which attend the infants school located on Saddleworth Road below the sites included in the Plan. The local School, GP and Dentist have no capacity to service the increased number of residents the Plan will create. There would need to be significant investment in Infrastructure however there is no provision in the Infrastructure Delivery Plan for the expansion of primary school places in Greetland and only an additional 75 secondary school places which is totally inconsistent with the NPPF guidelines. The council has failed to provide evidence as follows: Building houses on this plot would extend the built up area of Greetland and undermine the objectives of the Green Belt. It would also contribute to the extension of Greetland towards West Vale compromising Greetland as a Community, thus creating Urban Sprawl! Highways - The Council in its draft Infrastructure Delivery Plan it states 'There is no need to provide improvements to the West Vale junction.' I do not know how they have come to this conclusion. The current traffic problems encountered in this area cause a huge bottle neck of traffic at key times, the traffic lights are currently running at 117% and the maximum they should be running at is 93%! How can the plan to add 600 houses to Saddleworth Road not require improvements? Environmental Health - The Council claims it will mitigate against the environmental impact of increased Noise and Air Pollution but does not state how it will do this! High Flood Risk Green Belt - I do not want West Vale to become another Mytholmroyd!

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

Duty to Co-operate Reason:

I have significant concerns about the way in which the process of producing the Local Plan has been conducted. Not enough effort has been made to communicate the process of the Local Plan to residents and raise awareness of the consultation. The Greetland Pressure Group which was set up by the residents of Greetland to raise awareness of the Local Plan in our area have given us more consultation in the last 3 weeks than the Council themselves. Due to their efforts our area has been on Calendar and Look North focusing specifically on the flood problems these areas of green belt have incurred. The Council has not made it clear what they will do to make the Plan compliant.

Suggested Modifications:

Exclude LP0952 from the Local Plan

Comments:

Additional Evidence Link:

Comment ID **HRU939**

Site ref (if applicable): **LP0952**

Person ID: **1243732**

Name: **mrs Kathryn Sutcliffe**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

With specific regard to Community Involvement I do not believe that community involvement is in general accordance with the Calderdale Statement of Community Involvement 2015. Section 1.2 of the Calderdale

SCI 2015 calls for Clarity. -“We need to be very clear about what we are asking people and we must be sure that people understand what will happen as a result of this engagement. This includes being clear about what decisions have been made, what have not, and who will make the final decision.” Information about the proposed plan wasn't made aware to the residents of Greetland until a local Facebook group was started. Residents without social media presence will still be in the dark. The proposed sites of LP26, LP177, LP952 and LP1625: Greetland, Sunnybank and West Vale Wards, are still part of Elland. This seems misleading when searching planning as Greetland isn't mentioned. - The SCI under section 1.3 states -“to keep the process simple” and -“to make it easy to get involved” I'm not sure anything about the process is simple unless you work for the planning department. At a recent meeting organised by The Greetland Pressure Group and attended by over 200 residents, only a handful of people were aware of the plan and how to object to it. The council has provided a Sustainability Appraisal Report. However, under the chosen Option 4, of the 17 objectives analysed, 9 of them have been marked as -“uncertain” impact. I question how fully this report has been used as a 'tool for appraising policies to ensure they reflect social, environmental and economic factors' when the impact to the Greetland community at local site level of so many key outcomes are also uncertain including: accessibility to essential services, facilities and employment; to reduce the risk of flooding; to reduce the effect of traffic on the environment etc.

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

Sound Reason:

LP0026, LP0177, LP0952 and LP1625 are so close in proximity that they should be viewed jointly as well as individually. They are all in the Greetland ward so why have they been recorded on this plan as Elland. Main points of objection 1: Flooding 2: Loss of green belt and impact on wildlife corridor 3: Air Pollution and Traffic 4: Infrastructure 5: Urban sprawl Flooding We have seen first-hand the devastation caused by the recent floods (Boxing Day 2015 and 8 th -9 th February 2020). Every proposed site flooded. The upland sites LP0026, LP0952 and LP0952 were rivers, the land already saturated by the vast amounts of natural springs this area has. The lower level part of LP0177 was indistinguishable from the river. The flood plains that these sites provide are critical and flood regularly ; soaking up excess water at times of rainfall, allowing space for the water to flow and be stored on open land in times of flood, even after the river has burst its bank, and protecting land further downstream from potential flooding. The development of this land will increase flood risk further downstream towards Westvale, Elland and Brighouse (Evidence of which can already be seen on Social media sites, Calendar and national news outlets). To develop on these sites would contradict the DEFRA plan and the NPPF. The DEFRA 25year plan states that "National flood management involves the use of a variety of measures including storing water on open land". NPPF 14 (157b) states that plans should work to safeguard land from development that is required or likely to be required for current and future flood management. The current policy and legislation on flooding states - “due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere. Chapter 14, paragraph 163 of the NPPF states: -“ When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere It is abundantly clear that any development on these sites would directly oppose all these pieces of legislation and policies and would hugely increase the risk of flooding to both surrounding properties and the wider community in Greetland, West Vale and even as far as Elland. Any development of these sites and reduction in the capacity of these flood plains will only ensure that the flooding we now see will be more frequent and cause even more damage. This is not acceptable or fair therefore these sites should be removed from the local plan. Loss of Green Belt and Wildlife Corridor Calderdale's Green Belt Review map of 2020 clearly shows that all proposed sites in the Greetland ward are 'Most Sensitive Green Belt Parcels'! Does this mean the council disregards its own statements? Esther McVey, our current Housing Minister's written policy on Green Belt

land states "protecting the Green Belt goes beyond protection against development" NPPF chapter 13 states that there are 5 purposes to green belt land- CMBC has already stated that this land strongly fulfils these 5 purposes. NPPF ch13 paragraph 143 states "Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances". Protecting the green belt is very important. To include these sites in the local plan goes against all the above policies and there is no evidence of any special circumstances to support development on this land. The sites are a wildlife habitat for many different species. CMBC has already stated that a constraint is that Black Brook running through LP0177 is a UK BAP priority habitat. NPPF Chapter 15 states that planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes and sites of biodiversity. It also states - to protect and enhance biodiversity and geodiversity, plans should: identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including wildlife corridors. Developing these sites will put this precious wildlife corridor and all its inhabitants at great risk directly opposing the NPPF legislation and the DEFRA 25 Year Plan. This site should therefore be removed from the local plan Air Pollution and Traffic Congestion Air pollution and traffic congestion obviously go hand in hand. The junction of Saddleworth Road and Stainland Road in West Vale is already a bottle neck and far too congested and unable to cope with the traffic volume that passes through it on a daily basis. WSP Parsons Brinckerhoff Report on this Transport Network identifies that traffic congestion at the juncture of Stainland Road-Saddleworth Road would increase by approximately 105% traffic congestion at the juncture of Stainland Road-Rochdale Road would increase by over 100% Public Health England (PHE) (11th March 2019) reports that air pollution is the biggest environmental threat to health in the UK, with between 28,000 and 36,000 deaths a year attributed to long-term exposure. There is strong evidence that air pollution causes the development of coronary heart disease, stroke, respiratory disease and lung cancer, and exacerbates asthma. Professor Paul Cosford, Director of Health Protection and Medical Director at PHE, said: "Now is our opportunity to create a clean air generation of children Key interventions local authorities can take include redesigning cities so people aren't so close to highly polluting roads." Professor Cosford said: We recommend that at a local level, any new policy or programme of work which affects air pollution should aim to deliver an overall benefit to the public's health. Greetland School and Sunnybank Pre School are right on Saddleworth Road at the boundary of LP0177. The increase in traffic of over 100% and therefore pollution, that will be an outcome of development on this site ignores all the recommendations of PHE and put many people's health at risk especially that of our children which is totally unacceptable. Infrastructure Greetland Primary Academy, West Vale Primary School and Brooksbank High School are all full. With a proposed 600 houses, using Calderdale MBC's figure for school places of .36 per household (IDP section 9.14) this indicates another 206 school places would be needed. Where are these places to be found? Local Dentist has a waiting list of 600 for NHS places. The nearest NHS dentist was recently found (July 2019) 11 miles away in Kirklees. Local GP surgeries are already full. No plans have been put in place to cope with the expected population rise. Waiting times can already go beyond seven days and GP's are already pushed to 'breaking point'. Urban Sprawl The following is from Calderdale Councils website regarding green belt land and urban sprawl: 'Green Belt - The functions of the Green Belt are to: check the unrestricted sprawl of large built-up areas; prevent neighbouring towns from merging into one another; assist in safeguarding the countryside from encroachment; preserve the setting and special character of historic towns; and assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. At what point do you stop building and filling in the gaps? Is the future name of our area going to be called BRIGELLWESTVALEGREETBARKISLAND?

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

Duty to Co-operate Reason:

Duty to Cooperate Under the Localism Act 2011, Section 33A "Duty to co-operate in relation to planning of sustainable development", Paragraph 3 lays out the duties required of the local council of which points a



and b require preparation of local plans. Point d however calls for "activities that can reasonably be considered to prepare the way for activities within any of paragraphs (a) to (c) I question if Calderdale has sufficiently carried out all all activities needed to form a sustainable local plan with specific reference to show that release of Green Belt in LP26, LP177, LP952 and LP1625 meets exceptional circumstances?: - i.e. has all brownfield been explored as per NPPF paragraph 137? Has land recently regraded to brownfield on LP177 at the end of Ellistones Lane, and pending vacation of the Freundenberg factory now up for sale) been considered? It is CPRE's view after meeting local residents that they consider these brownfield sites broadly positive. - I also question if there has been adequate exploration of infrastructure requirements and mitigation for a 33.8% growth in a community? -The council has provided a Sustainability Appraisal Report. However, under preferred Option 4, 9 of the 17 objectives analysed have been marked as - "uncertain" impact. I question how fully the necessary 'activities' needed to form a sustainable plan have been carried out? e.g. risk assessment and necessary mitigation. How can a plan be sustainable and Green Belt destroyed when there are so many question marks?

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609514>

Comment ID **HRU943**

Site ref (if applicable): **LP0952**

Person ID: **1243746**

Name: **Mr Samuel Sutcliffe**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Section 1.2 of the Calderdale SCI 2015 calls for Clarity. - "We need to be very clear about what we are asking people and we must be sure that people understand what will happen as a result of this engagement. This includes being clear about what decisions have been made, what have not, and who will make the final decision." Information about the proposed plan wasn't made aware to the residents of Greetland until a local Facebook group was started. Residents without social media presence will still be in the dark. The proposed sites of LP0026, LP177, LP952 and LP1625: Greetland, Sunnybank and West Vale Wards, are still part of Elland. This seems misleading when searching planning as Greetland isn't mentioned. - The SCI under section 1.3 states - "to keep the process simple" and - "to make it easy to get involved" I'm not sure anything about the process is simple unless you work for the planning department. At a recent meeting organised by The Greetland Pressure Group and attended by over 200 residents, only a handful of people were aware of the plan and how to object to it. The council has provided a Sustainability Appraisal Report. However, under the chosen Option 4, of the 17 objectives analysed, 9 of them have been marked as - "uncertain" impact. I question how fully this report has been used as a 'tool for appraising policies to ensure they reflect social, environmental and economic factors' when the impact to the Greetland community at local site level of so many key outcomes are also uncertain including: accessibility to essential services, facilities and employment; to reduce the risk of flooding; to reduce the effect of traffic on the environment etc.

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

## Sound Reason:

LP0026, LP0177, LP0952 and LP1625 are so close in proximity that they should be viewed jointly as well as individually. They are all in the Greetland ward so why have they been recorded on this plan as Elland.

Main points of objection 1: Flooding 2: Loss of green belt and impact on wildlife corridor 3: Air Pollution and Traffic 4: Infrastructure 5: Urban sprawl Flooding We have seen first-hand the devastation caused by the recent floods (Boxing Day 2015 and 8 th -9 th February 2020). Every proposed site flooded. The upland sites LP0026, LP0952 and LP0952 were rivers, the land already saturated by the vast amounts of natural springs this area has. The lower level part of LP0177 was indistinguishable from the river. The flood plains that these sites provide are critical and flood regularly ; soaking up excess water at times of rainfall, allowing space for the water to flow and be stored on open land in times of flood, even after the river has burst its bank, and protecting land further downstream from potential flooding. The development of this land will increase flood risk further downstream towards Westvale, Elland and Brighouse (Evidence of which can already be seen on Social media sites, Calendar and national news outlets). To develop on these sites would contradict the DEFRA plan and the NPPF. The DEFRA 25year plan states that "National flood management involves the use of a variety of measures including storing water on open land". NPPF 14 (157b) states that plans should work to safeguard land from development that is required or likely to be required for current and future flood management. The current policy and legislation on flooding states - "due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere. Chapter 14, paragraph 163 of the NPPF states: -" When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere It is abundantly clear that any development on these sites would directly oppose all these pieces of legislation and policies and would hugely increase the risk of flooding to both surrounding properties and the wider community in Greetland, West Vale and even as far as Elland. Any development of these sites and reduction in the capacity of these flood plains will only ensure that the flooding we now see will be more frequent and cause even more damage. This is not acceptable or fair therefore these sites should be removed from the local plan. Loss of Green Belt and Wildlife Corridor Calderdale's Green Belt Review map of 2020 clearly shows that all proposed sites in the Greetland ward are 'Most Sensitive Green Belt Parcels'! Does this mean the council disregards its own statements? Esther McVey, our current Housing Minister's written policy on Green Belt land states "protecting the Green Belt goes beyond protection against development" NPPF chapter 13 states that there are 5 purposes to green belt land- CMBC has already stated that this land strongly fulfils these 5 purposes. NPPF ch13 paragraph 143 states "Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances". Protecting the green belt is very important. To include these sites in the local plan goes against all the above policies and there is no evidence of any special circumstances to support development on this land. The sites are a wildlife habitat for many different species. CMBC has already stated that a constraint is that Black Brook running through LP0177 is a UK BAP priority habitat. NPPF Chapter 15 states that planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes and sites of biodiversity. It also states - to protect and enhance biodiversity and geodiversity, plans should: identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including wildlife corridors. Developing these sites will put this precious wildlife corridor and all its inhabitants at great risk directly opposing the NPPF legislation and the DEFRA 25 Year Plan. This site should therefore be removed from the local plan Air Pollution and Traffic Congestion Air pollution and traffic congestion obviously go hand in hand. The junction of Saddleworth Road and Stainland Road in West Vale is already a bottle neck and far too congested and unable to cope with the traffic volume that passes through it on a daily basis. WSP Parsons Brinckerhoff Report on this Transport Network identifies that traffic congestion at the juncture of Stainland Road-Saddleworth Road would increase by approximately 105% traffic congestion at the juncture of Stainland Road-Rochdale Road would increase by over 100% Public Health England (PHE) (11th March 2019) reports that air pollution is the biggest

environmental threat to health in the UK, with between 28,000 and 36,000 deaths a year attributed to long-term exposure. There is strong evidence that air pollution causes the development of coronary heart disease, stroke, respiratory disease and lung cancer, and exacerbates asthma. Professor Paul Cosford, Director of Health Protection and Medical Director at PHE, said: "Now is our opportunity to create a clean air generation of children. Key interventions local authorities can take include redesigning cities so people aren't so close to highly polluting roads." Professor Cosford said: We recommend that at a local level, any new policy or programme of work which affects air pollution should aim to deliver an overall benefit to the public's health. Greetland School and Sunnybank Pre School are right on Saddleworth Road at the boundary of LP0177. The increase in traffic of over 100% and therefore pollution, that will be an outcome of development on this site ignores all the recommendations of PHE and put many people's health at risk especially that of our children which is totally unacceptable. Infrastructure Greetland Primary Academy, West Vale Primary School and Brooksbank High School are all full. With a proposed 600 houses, using Calderdale MBC's figure for school places of .36 per household (IDP section 9.14) this indicates another 206 school places would be needed. Where are these places to be found? Local Dentist has a waiting list of 600 for NHS places. The nearest NHS dentist was recently found (July 2019) 11 miles away in Kirklees. Local GP surgeries are already full. No plans have been put in place to cope with the expected population rise. Waiting times can already go beyond seven days and GP's are already pushed to 'breaking point'. Urban Sprawl The following is from Calderdale Council's website regarding green belt land and urban sprawl: 'Green Belt - The functions of the Green Belt are to: check the unrestricted sprawl of large built-up areas; prevent neighbouring towns from merging into one another; assist in safeguarding the countryside from encroachment; preserve the setting and special character of historic towns; and assist in urban regeneration, by encouraging the recycling of derelict and other urban land'.

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

Duty to Co-operate Reason:

There are so many constraints and negatives to all these sites that cannot be adequately mitigated against. To develop these sites opposes so many policies, recommendations and pieces of legislation which CMBC appear to have given little or no consideration to. I respectfully ask that these sites are removed from the Local Plan. They should never have been included as they are completely unsuitable for numerous reasons.

Suggested Modifications:

All these sites should be removed from Calderdale plans and be replaced with potential brown field sites in accordance with government policy.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609553>

Comment ID **HRU945**

Site ref (if applicable): **LP0952**

Person ID: **960336** Name: **Mrs Caroline Wood** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

This proposal does not comply with the NPPF

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

Sound Reason:

This plan is not consistent with the NPPF rules

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

Duty to Co-operate Reason:

The Calderdale Council Brownfield Land Register has not been updated since 2018. It is a legal requirement that this should be updated/reviewed annually

Suggested Modifications:

Remove the 'most sensitive Green Belt parcels' entirely from the plan, use existing Brown Field sites first as instructed in the NPPF

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609570>

Comment ID **HRU948**

Site ref (if applicable): **LP0952**

Person ID: **1243763**

Name: **Miss Gillian Reid**

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:

Having lived in Greetland since birth (now aged 36) I have seen many changes in our village over the years. None of which I have ever felt compelled to write an official objection to up until now. After seeing the plans LP0177 (Land adjacent Ellistones Place) I am shocked to hear along with other plans LPO952, LPO026 AND LP1625 the enormous amount of building work being planned for such a small, beautiful village. If these plans are to proceed, I feel our local area will become completely unrecognisable as the small and beautiful village we once were. Please find below the reasonings behind my strong objections to this. The reasons are vast so for ease I have split the factors into the following categories: 1.Environmental 2.Economic 3.Social Environmental The plans for LP0952 along with LP0177, LP0026 and LP1625 all cover our valuable Greenbelt land in Greetland. This land is classified as a 'most sensitive' greenbelt, please find evidence of this in the following link to the Councils Greenbelt Review: [https://calderdale.gov.uk/v2/maps/green-belt-review?fbclid=IwAR0-YtEHRsU5\\_gSN2JMA4zPU97P0GPsWU0\\_lq263NGHjCx4\\_m66ibHv8vaQ](https://calderdale.gov.uk/v2/maps/green-belt-review?fbclid=IwAR0-YtEHRsU5_gSN2JMA4zPU97P0GPsWU0_lq263NGHjCx4_m66ibHv8vaQ) I simply can not see how the amount of proposed building work (600 homes through the 4 aforementioned sites) can possibly be justified on this beautiful Greenbelt land. This land provides a wildlife corridor, contains a public right of

way and reduces the flood potential of not only our own local area but for those downstream of us and is meant to include prevention of urban sprawl. To build on this land will destroy all of these benefits this Greenbelt area offers to both the wildlife and the local community. The Department for Environment, Food and Rural Affairs' (DEFRA) 25-year plan states ' we will protect ancient woodlands and grasslands, high flood risk areas and our best agricultural land' . To build on this site would go be going directly against this statement. There is plenty of wildlife to be seen in and around LP0952, this plan would take away their natural habitat which is crucial to their survival, how can we justify taking away these species homes when we have already taken so much from them and are not doing enough with the land we have already taken. In June 2016 The CMBC published their Local Risk Management Strategy. This document states -"It is the local flood risk management strategy's main objectives to take steps to reduce flood risks in Calderdale" One of the ways they proposed to do this was to -"develop a land management strategy that will potentially reduce upland runoff" The proposed building on any of the Greenbelt land will only exacerbate any runoff and flooding on lower lying land and further down the valley i.e. West Vale and Elland. We only have to look at our surrounding areas and effects that floods have on them. For example, Sowerby Bridge and Hebden Bridge. I fear that this development will cause similar tragic situations where businesses and homes of local residence are ruined with the clean-up/prevention bill costing millions. Why would we want to add to this problem when we are working so hard to find solutions to it in other local communities. Our natural land is already preventing this from becoming a problem for many, why not let this continue? Storm Ciara struck Calderdale with further flooding on 09/02/20 flooding many of the same places as Boxing Day 2015, this is evidence that the area floods more frequently than 'once a century'. The flood plains in this area did their job by decelerating the flow of water down the valley, I dread to think of the outcomes had this land been built on at the time. The CMBC Flood strategy was born following the Boxing Day floods of 2015. Calderdale was the worst affected borough in the UK. Greetland saw localised flooding all along the flood plain (sites LP0952 and LP0177 ) and the Black Brook. The houses on Woodfield Drive were affected. Multiple sites in West Vale were affected and further downstream the Elland Bridge collapsed and with that a massive £4 million repair bill. Building on our Greenbelt land will only lead to worse flash flooding as this land helps slow the flow of water to the main watercourses. Current legislation on building on flood risk areas can be found here: <http://www.environmentlaw.org.uk/rte.asp?id=105> This contains the following quote 'new development in the flood risk areas would only be allowed when it is exceptionally necessary' I find it very hard to believe it to be 'exceptionally necessary' to build 600 homes in this space when there are plenty of other areas of either brownfield or less sensitive to flooding which can be considered first. A quick look at the website Right Move will show you there are approx. 600 homes for sale within a 3-mile radius of these sites. Whilst these homes are available for anyone wishing to move to the area why is it 'exceptionally necessary' that we build 600 more? To me this only indicates that the demand for houses in this area may not be as high as perceived by CMBC and therefore we do not need to develop on any more of our precious land. Economic As of 31/01/20 the UK is in a Brexit transition period, leaving us with uncertainty for our future economic prospects. The plans for LP0952 and the other 3 mentioned sites have been proposed prior to Brexit and the forecast on population growth rates. This means the plans are already out of date as until this transition period is complete and we know more about our relationship with Europe and the rest of world how can we know how many new homes we may or may not see a need for? Would it not be better to put these plans on hold until we know the outcomes and needs, instead of building for the sake of building? The current roads around Greetland already struggle with the amount of traffic seen through the village and into the already chronic traffic issues of Westvale. Adding a further 600 homes to this already growing problem is only going to make matters worse. I can't even begin to imagine what another potential 600+ cars going through west vale would look like, other than just a complete standstill. The daily struggle to get in and out of Greetland especially at peak times will only be added to. At peak times of school drop off and pick up Saddleworth Road already becomes an absolute nightmare, I'm not sure how the road would physically cope with even more children needing access this school site. The number of vehicles in the road space along with the terrible parking that often occurs around school pick up zones is already an accident waiting to happen, do we really need

to add to the danger by adding even more people to the mix? Also, with the added traffic spending much more time standing still with lengthy delays this will all contribute to poor air quality especially around our schools. Is this really what we think will be best for our local children? The area already struggles with the condition of the local roads with the current level of traffic. Why are we not addressing these problems before adding to them? If the council's budget for road maintenance can not stretch to repairing the damage by the current level of traffic where is the sense in adding a further 600+ cars to the road? With a lack of capacity for NHS dentists in the area, adding a further 600 homes is only going to increase the number of people with poor oral health due to lack of local availability. There will also be a strain on the local GP surgeries where it is already difficult to get an appointment for many. Social This greenbelt land gives people chance to enjoy nature whilst contributing to both their physical and mental wellbeing. Surely taking away part of these stunning surroundings will have a negative impact on the health and quality of life of those who enjoy it regularly. The air will be more polluted, stress and anxiety levels will increase due to fear of further flooding, and there will be an increase in hospital admissions due to insufficient numbers of GP appointments.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU959**

Site ref (if applicable): **LP0952**

Person ID: **1243806**

Name: **mr andrew jackson**

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?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609642>

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Comment ID **HRU968**

Site ref (if applicable): **LP0952**

Person ID: **1241940**

Name: **Mrs Goda Pateman**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I refer you to the Calderdale Statement of Community Involvement 2015, section 1.2. This section calls for clarity. Many residents of Greetland were unaware of the proposed new allocations ; there was not enough effort on the Council's side to ensure that every resident of Greetland was informed of the Local Plan. People will only be clear, and understand what will happen to their neighbourhood if they are properly and clearly informed. For example: it's unreasonable of the Council to assume that the residents of Greetland would automatically check folder 10 ; Elland Additional Housing Sites. Each of the proposed sites are marked as This statement does not add to clarity. These fields are Greenbelt. Sustainability Appraisal Report ; I refer here to option 4: of the 17 objectives analysed, nine of them have been marked as UNCERTAIN More than half. Were the objectives thoroughly analysed and the findings inconclusive, or were they not analysed thoroughly enough so as to give a conclusive answer? The statement ' UNCERTAIN impact' covers both of the above scenarios. This does not add to clarity.

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

Sound Reason:

Has the council Considered the impact of Brexit on the UK's economy? Ruled out all other sites which are less sensitive? Been in talks with neighbouring authorities and asked if they have any potential sites? Considered the impact such a large development would have on the village of Greetland? Considered the direct and indirect impact of flooding on residents and businesses in Greetland, West Vale and Elland and beyond? Considered negative impact of urban sprawl, such as loss of farmland and wildlife, increased car use and neglect of older towns? Additionally: There are no exceptional reasons to remove greenbelt status. Greenbelt spaces were designated to reduce urban sprawl, safeguard the countryside and historic towns, and encourage urban regeneration. The proposed LP fails on all those Disproportionate growth of Greetland community. Table 3 of of the Calderdale Infrastructure Delivery Plan 2019 shows the distribution of household growth for 2018-2033. It covers Elland, Greetland, Stainland and Holywell Green in one group. The household growth for the whole area is about 00% , the household growth for Greetland is almost 34%. The Council's decisions are not consistent with what a permissible increase to a community should be: report CC37, LP1028 (Greenbelt) had a planned site for 122 dwellings removed. One of the reasons given was 'disproportionate increase to Barkisland village'. If 16.6% I disproportional to one village then why is an increase of over 22% or even 33.8% not disproportionate to another? This shows a lack of consistency in the application of NPPS policies. Paragraph 103 of the NPPF : 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 transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. The proposed development almost invites the need to travel by motor vehicle and therefore increases the congestion and gas emissions. Direct and indirect impact of building on floodplains. The proposed development will have a significant detrimental impact on flooding. The run-off into Black Brook will cause serious downstream effects, for example the floods of 9 th February 2020 saw Greetland Cricket Club, Heath Rugby Club and Clayhouse Park all under water. How can any flood plan mitigate against the risk of even more severe flooding in West Vale and Elland leading to major issues for all the businesses and residents? The local wildlife which is diverse and rich, will be decimated by any further development. Loss of public space. The Council should encourage Calderdale residents to spend

leisure time on their doorstep, thereby reducing congestion and emissions generated by car journeys. In this way, public spaces and greenbelt areas would be protected and the wellbeing of residents preserved.

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

Duty to Co-operate Reason:

Calderdale have failed to consult residents in open and fair manner regarding the proposed development

Suggested Modifications:

Greenbelt should remain greenbelt. Calderdale Council should seek more creative solutions to repurpose unused and derelict spaces to avoid urban sprawl and avoid creating a doughnut effect. Proposed plans LP0026 (The Gate Farm), LP0177 (Land adjacent Ellistones Place), LP0952 (Land at New Gate Farm) and LP1625 (Land to the west of Silverdale Terrace) should all be removed from the Local Plan

Comments:

Additional Evidence Link:

Comment ID **HRU973**

Site ref (if applicable): **LP0952**

Person ID: **1228589**

Name: **Mrs Debbie Chew-Moulding**

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 NPPF states -“Once established Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified , through the preparation or updating of plans.”“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: makes as much use as possible of suitable brownfield sites and underutilised land; Has this been fully exhausted? optimises the density of development, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport Has this been fully exhausted in already allocated housing sites within the borough, can this be increased? 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. Has this occurred? The reasons for additional housing is due to the economic strategy and increase in economic growth? Is the economic strategy rigorous following Brexit? Can additional sites be accommodated in neighbouring authorities as part of the Leeds City Region approach? The inspector acknowledges that the -“relationship between employment growth and new housing is complex.-“ Turely's report (2019) on -“Modelling the economic implications of the proposed housing requirement Calderdale



Council" contributes to how the labour force is assumed to behave, however, it does not appear to have considered accommodating the housing in neighbouring authorities. It is felt that the Council has not fully exhausted all options in order to prevent development on Green Belt land. The NPPF states that "when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport ." The site reports indicate that distance to the nearest rail station is more than 2km away and distance to nearest bus stop is between 400m & 2km away. It is disputed that this site is well served by public transport , whilst it may be argued that additional development would contribute to an improved public transport service, at present, the land being allocated is considered to go against the above principles of NPPF. 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. It is considered, that the site performs strongly against the 5 key Purposes of Green Belt and should not be allocated for housing: to check the unrestricted sprawl of large built-up areas; This particular piece of land allocated (LP0952) would strongly contribute to urban sprawl. However, it is felt that this site can not be considered in isolation from the other development proposed in Greetland and that the accumulative affect of all the proposed development sites would contribute to the sprawl of built up areas. to assist in safeguarding the countryside from encroachment; (Development of these sites, does not assist in safeguarding the countryside from encroachment, the sites are greenfield and will lead to a loss of Grade 3 Agricultural land, which is currently used and is of 'good to moderate' quality of land). 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 (The sites proposed are Greenfield) The NPPF states that when defining Green Belt boundaries, plans should define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. Whilst the Council has acknowledged the existing sites have a strong boundary and once developed it will also have a strong boundary, it is felt that this site in particular is reliant on the other proposed housing sites being allocated, which all have their own issues and concerns. In addition to this, it is also worthy to note that Environmental Health does not support housing on this site. However, within the site report Environmental Health acknowledge- "it may be possible to justify restricting development to the northern edge" However, this itself would go against the principles of NPPF for defining strong boundaries within the Green Belt.

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

Duty to Co-operate Reason:

Suggested Modifications:

The site is situated within the Greenbelt and are contradictory to NPPF. It is considered the site should be removed from the allocation of an additional housing site.

Comments:

Additional Evidence Link:

Comment ID **HRU982**

Site ref (if applicable): **LP0952**

Person ID: **1243601**      Name: **Mr Mark Connett**      Organisation:

Agent ID:      Name:      Organisation:

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

Legal Compliance Reason:

No The proposal for the LP0952 fails to acknowledge many planning guidelines and/or advice given on environmental & social factors. Upon reading the national policy planning framework, I have found many points that contradict what the council is aiming to keep/put in place, the main one I believe is below. Proposals affecting the Green Belt Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are: a) buildings for agriculture and forestry; b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it; c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces; e) limited in filling in villages; f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: " not have a greater impact on the openness of the Green Belt than the existing development; or " not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority. To the best of my knowledge the council have failed to notify those closest to the site aware they were even added back in into the plan way back in 2017 I don't believe social media and word of mouth should be the way for the local people to find out. I feel it's a lack in communication at the very least.

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

Sound Reason:

No Flooding - Calder Valley is well known for flooding let alone the site in question which naturally takes a lot of the surface water that flows from the higher parts of Greetland. The proposal does not meet national policy. The NPPF states that "Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere". The recent floods we had on In February of 2020 only strengthen the point I am trying to make. We are constantly having interruption on our road network by the council having to continually maintain and repair the water system, the water going into these drains as a result of the flood plain being destroyed, this would put even more pressure on this, leading to more roadworks and even greater congestion. Clean Air Policy ; The sheer quantity of houses proposed on this site would mean far higher emissions and air pollution in west vale, on commutes to and from Halifax and beyond. Calderdale Council have declared a climate emergency yet are potentially willing to release greenbelt land with the intention to build a large amount of houses whilst destroying the natural benefits of the trees absorbing and storing the Carbon dioxide that we are creating. This site is also directly surrounding a preschool and the key stage 1 site of The Greetland Academy. Saddleworth Road is already a hugely congested road and that's before development of more houses that would use this road. From September 2020 I will have a child at each of these schools so I feel very passionate about how the children attending these schools will be directly

affected from the decline in air quality around them for up to 7 hours a day. The proposition that this site allocation is where they spend most of their time seems highly unjustified when there are many other places in Calderdale more suited. The Green Belt - Loss of large area of Green Belt and Wildlife Corridor

The NPPF states that When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused on these grounds alone this site should be removed from the local plan. The Wildlife Corridor has a well-used public footpath that travels the whole length of the proposed Local Plan build site, as well as this the area is home to wild deer, foxes, squirrels, field mice, barn owls, kingfisher and much more. The brook itself is a healthy natural water-course with a thriving population of wild brown trout. Taking away something so natural and therapeutic that benefits local people by getting in touch with nature and to get children out into open spaces should be the last resort and with so many brownfield sites still available I believe this goes against many of the policies on the NPPF. A report recently submitted to the Adult Health & Social Care Scrutiny Board stating the need to retain Green Spaces for the Health and Wellbeing of Calderdale residents. This report was submitted by the Head of Planning. (This report is on Calderdale MBC's Website) Infrastructure - The road network in Greetland is already at breaking point on a good day, let alone when we have endless amounts of roadworks to contend with. the roads simply cannot take the proposed number of cars which all of these houses would bring with them. it takes me a good 20 minutes to do a 0.6 mile journey to the motor way on a morning. Both The Greetland Academy and West Vale Primary are full to capacity, as well as the feeder high school Brooksbank. Stainland Road Medical Centre would also struggle to attend to the additional patients this would bring with it, the local dentist has a 600 place waiting list for NHS patients.

Allocation of land - I fail to understand why Greetland, Elland & Stainland have been grouped together, I believe this to be a deliberate attempt to mask the disproportionate quantity of building works being allocated to Greetland. while other wards have no sites added to the local plan. I believe this be disproportionate to the Greetland area, put that together with them all on one road and it's ridiculous. LP0026, LP0177, LP0952 and LP1625 are all on Saddleworth Road. Greetland is a community in its own right. Greetland is HX4 and a village whereas Elland is HX5 and a town I don't think we shouldn't be grouped together. The government requires land for the local plan to be designed in the whole of Calderdale there is no requirement to assign housing to an area that has such high flood risk, let alone land that routinely floods which will only become more frequent through climate change. density of houses could be increased in areas where land is not susceptible to flooding. Boris Johnson has called for councils to stop building on flood plains as well as the new SoS for Env. George Eustice has also pointed to this being a long term problem on them grounds alone this site along with LP0026, LP1625 & LP0952 should be removed from the local plan due to long term flooding.

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

Duty to Co-operate Reason:

I have not had any notification whatsoever of any potential plans to the local surrounding area.

Suggested Modifications:

This site should be removed from the local plan. Due to insufficient infrastructure and no exceptional circumstance to use Green belt land.

Comments:

Additional Evidence Link:

Comment ID **HRU989**

Site ref (if applicable): **LP0952**

Person ID: **1243824**

Name: **miss zoe pickles**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

-“We need to be very clear about what we are asking people and we must be sure that people understand what will happen as a result of this engagement. This includes being clear about what decisions have been made, what have not, and who will make the final decision.” The proposed site is directly opposite where i live on GateHead Farm and a development on this site would have a huge impact for my family and our family life, yet to this day, I have never received a single piece of correspondence regarding this proposal, therefore lacking the clarity and involvement which the SCI calls for. For the past year and a half I have had to tolerate the development of the mill - this is merely 4 houses and 4 apartments. The stress and downgrade to our quality of life has been significant to the extent it is no longer enjoyable to live in our 'home'. I can only imagine the distress caused by a development of the size being proposed literally on our doorstep.

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

Sound Reason:

Air pollution: There would be a significant increase in traffic on roads that already badly congested. Public transport is not sufficient in the area to suggest the majority of new residents would not be adding to the congestion. This is especially concerning given the proximity of Greetland Academy and the number of children that would be badly affected by such pollution in addition to the noise pollution. Would more public transport be added to compensate and more trees planted to help protect the school from the visual pollution created by the development? Flooding - This land has struggled in recent weeks to cope with the rainwater. I have witnessed firsthand how close the floodwater came to my back door at the bottom of Gatehead Lane. If it was not for the fields intercepting the rainwater i do not like to think of how different the outcome may have been - the very fields you are planning to build on. Infrastructure: As mentioned above the public transport is not adequate for the area. People would be using one road in and out. Local schools are over subscribed which would mean parents driving further distances to take children to their school and back. All doctor surgeries are full. The infrastructure in the area simply can't cope with any additional housing of the proposed scale. Most new housing in this area is not affordable to locals. Rather those that are commuting to larger near by cities take up resident thus adding even more congestion. I do not believe plans have been transparent or communicated to those who will be most greatly affected by it.

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

Duty to Co-operate Reason:

I do not believe plans have been transparent or communicated to those who will be most greatly affected by it.

Suggested Modifications:

That the 4 sites in the Greetland area (LP0026, LP0952, LP0177, and LP1625) be removed from the plan.

Comments:

Additional Evidence Link:

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Comment ID **HRU991**

Site ref (if applicable): **LP0952**

Person ID: **1241730**

Name: **Mrs S Hirst**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

In my opinion the Council have failed to meet its three core principals of Community Involvement namely, Clarity, Inclusivity and Integrity. If it was not for the support of the local community many people would be unaware that the sites have been put back into the Local Plan and that a further consultation period has been made. Exactly what is expected of the general public is also unclear. Phrases such as -“Is this Sound” have very little meaning to general public. The use of acronyms, legal and planning -“jargon” make the plan far from user friendly. I do not know how the -“average lay person” can be expected to form a clear and sound argument. With this in mind I would say that the plan is not at all -“inclusive” and as such would exclude many people from being able to express their opinions. The Local Plan Website is extremely challenging to navigate, even for the most computer literate. The Council are showing very little Integrity, with local Councillors and the community not being kept up to date with what is happening. The council has also failed to listen to the community in compiling the plan. Residents were asked to comment on the removal of this site (LP0952) from the Green Belt in 2015 and then on its inclusion in the Local Plan in 2017. In both instances the overwhelming response from the community was that the land should not be in the Local Plan and should remain within the Green Belt. The sites in Greetland got the highest number of comments compared to the rest of Calderdale. Despite this, the Council, after initially removing the site, has now put it back into the Local Plan with no sound reasoning to support its actions. In addition, concern has been expressed by residents, as to why Greetland has been classified as part of Elland. Greetland is completely separate from Elland and it is misleading for the two areas to suddenly be -“consolidated”. Residents of Greetland, on reviewing the Local Plan would have no reason to -“look under” Elland and would miss the opportunity to put forth their comments. Within the -“Settlement Hierarchy” the villages of Greetland/West Vale are not even listed, but the villages at either end of the Greetland (Holywell Green and Barkisland) are listed as Neighbourhood/Small rural areas. In connection with this, there are also questions as to true increase in the amount of housing stock for the Greetland area. In the Councils calculation for -“Distribution of House Growth” (Table 3 Infrastructure Delivery Plan 2019) it shows Greetland, along with Elland, Holywell Green & Stainland to have a growth of 8.21%. However, if Greetland and West Vale are viewed on their own ; which they should be ; using the latest Polling District Figures, the increase in housing stock is around 20%. This is too much for a village of this small and with such limited infrastructure. The Council also appear to have -“gone against” a number of policies set out in the National Policy Planning Framework such as: When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. The council have not demonstrated that development of this Green Belt will outweigh the harm. The Council have simply created a vague list of possible ways to -“mitigate” problems, most of which have no concrete or sound basis and in some cases are just totally incorrect. When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. The land proposed for development is used as a natural storage area which controls the amount of water going down to Black Brook and ultimately helps prevent even more flooding down the valley.

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

Sound Reason:

**LOSS OF GREEN BELT** The site is currently designated as being in an area of Green Belt and in a recent survey it was seen to perform well in all areas apart from one. This area of Green Belt is also classified as being highly sensitive. In 2018 the Council deemed that this area of land was of such high importance, that it should be removed from the local Plan and yet now feels that the land is suitable for development. The council have not demonstrated any sound reason for this reversal, other than more land is required. The council have also failed produce any evidence, to show that all available Brownfield sites have been exhausted. Indeed, when challenged, they seem unable to produce any current information with regards to Brownfield availability. This site, currently provides a strong boundary which prevents urban sprawl. The developer (Keyland, Delivery Statement 2017) states -“the site does not serve any Green Belt purpose”|” This is at complete odds to the Council Survey which clearly states the land performs strong in all but one area. Removal of this Green Belt land could, set the precedence, for removing even more of the land from the Green Belt and for development to take place all along the valley. Any development of this Green Belt area would have a major impact on the landscape and dramatically change the character of the locality forever. The development of this area would also mean a considerable loss of Open Space. The Council have stated in their report that removal of this land would have -“no loss/no impact” on the area. There seems to be no consideration that taking the Saddleworth Road Development as a whole, would mean a loss of nearly 25 hectares of open Green space which would have a detrimental effect on the local community. The area is regularly used by walkers, cyclists, horse riders and families. The area is becoming even more popular due to a number of initiatives by the owners of the industrial plant. The site has a public right of way to the west of it. Whilst the developers have stated that this will be retained, it does not take into account what effect the development would have on the character and tranquillity of this area. Walking through a housing estate is not the same as walking through untouched green belt fields.

**FLOODING** The fields within this site all provide land for the run off from the Moorland at the top of the valley. This is clearly demonstrated when we have heavy rain fall. I have enclosed Photos taken within 30 mins of each other and it is clear to see how quickly the water builds up in the field. That water is still evident nearly a week later. Building on top of this natural soak away would leave nowhere for the rainfall to collect. Whilst the developers may well be able to drain the sites successfully there appears to be not account taken of where that water will then go and what potential that has for flooding elsewhere in the valley. Given the recent catastrophic flooding the area experienced on February 9th this year ; the second time in less than four years, greater care needs to be paid to the building on flood plains and natural soak always.

**ENVIRONMENTAL HEALTH** The Southern edge of proposed site is within 65 metres of Industrial Premises. In 2005 Planning permission on this site was refused, due to the potential effect of noise, dust and odours, from the industrial site, on the occupiers of the property. The council also went on to say that -“the land currently provides a good stand-off between conflicting land uses” In the original site report the Environmental health once again would not support the site for residential development but has now changed their mind even though the situation is the still the same. This is concerning. The creation of so many houses is going to have a large impact on the amount of pollution created. The development, across all the sites on Saddleworth road, has the protentional to add over 1000 cars to the road. Currently pollution figures are not collected for Saddleworth Road due to -“its open nature” Allowing pollution to disperse. However, this natural -“escape route” Will be eroded if this considerable area of land is developed. Currently traffic can be cued nearly half a mile up Saddleworth Road waiting to get through the traffic lights in West Vale. The possibility of an increase in cars will mean more cars on the roads, with more engines idling and pumping out more pollution. This is particularly worrying due to the local infant school being next to the road. Monthly Pollution readings for West Vale obtained from 2019 Air Quality Annual Status Report show that these monthly readings regularly exceed the 40mg/ limit, which has been set by the Council. More traffic will only increase these numbers which will be against their own targets.

**INFRASTRUCTURE** The MP for Calderdale, Craig Whittaker, has already expressed his concern regarding

the "lack of a robust Infrastructure Plan" and how this will have a negative impact on the plan. The Infrastructure plan has no concrete solutions and does not address the many problems this development would bring such as lack of school places, both infant/junior and secondary, no NHS dentists and the pressure it will put on the local GP practice, to name but a few. The local school is unusual in that it split over two sites which are approximately half a mile apart. The intake is based on the proximity to the school site on Saddleworth Road. With the increase in housing on this road it could potentially mean that children living next to the School on Rochdale road could not secure a place. Potentially it could mean parents having to drive their children to schools away from the village thus adding to the congestion and pollution. The public transport is very limited, buses to Halifax run once every hour, do not operate in an evening and have limited service at a weekend. The buses frequently miss and consequently you are unable to rely on them as a means of commuting to work. The main concern though is how the increase in traffic will impact on the area and the lack of any foresight as to what impact this have. The Site Report states that - "Mitigation measures are likely to be required at the Stainland and Saddleworth road Junction" however it does not detail what the - "mitigation" will be. Whilst the Infrastructure plan gives details of local road - "improvements" which are due in this area, they are not of a scale which help alleviate the congestion at this junction. It is also worthwhile noting that the M62 has just undergone extensive works to make it a - "smart motorway" which should help reduce congestion. However further schemes to convert areas to - "smart motorways" is now on hold pending Government review into its safety. Using the Sustainability Appraisal Report it can be seen that this site has 11 uncertain impacts, 2 negatives and only 3 positives. When read in detail I would even question the validity of some of these - "positive" impacts and suggest they are more suited to uncertain or even negative. Given the amount of uncertain and negative points raised, I would question the validity of recommending this site as a suitable and sustainable area for development. Whilst we have been told that each site must have a separate and different submission, it has been nearly impossible to do this as each area of land is so interlinked. Indeed, to consider each site in isolation is not taking into account the full impact which developing over 24 hectares, with nearly 600 houses, will have on our local community and the environment.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609657>

Comment ID **HRU992**

Site ref (if applicable): **LP0952**

Person ID: **1241730**

Name: **Mrs S Hirst**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

In my opinion the Council have failed to meet its three core principals of Community Involvement namely, Clarity, Inclusivity and Integrity. If it was not for the support of the local community many people would be unaware that the sites have been put back into the Local Plan and that a further consultation period has

been made. Exactly what is expected of the general public is also unclear. Phrases such as -“Is this Sound” have very little meaning to general public. The use of acronyms, legal and planning -“jargon” make the plan far from user friendly. I do not know how the -“average lay person” can be expected to form a clear and sound argument. With this in mind I would say that the plan is not at all -“inclusive” and as such would exclude many people from being able to express their opinions. The Local Plan Website is extremely challenging to navigate, even for the most computer literate. The Council are showing very little Integrity, with local Councillors and the community not being kept up to date with what is happening. The council has also failed to listen to the community in compiling the plan. Residents were asked to comment on the removal of this site (LP0952) from the Green Belt in 2015 and then on its inclusion in the Local Plan in 2017. In both instances the overwhelming response from the community was that the land should not be in the Local Plan and should remain within the Green Belt. The sites in Greetland got the highest number of comments compared to the rest of Calderdale. Despite this, the Council, after initially removing the site, has now put it back into the Local Plan with no sound reasoning to support its actions. In addition, concern has been expressed by residents, as to why Greetland has been classified as part of Elland. Greetland is completely separate from Elland and it is misleading for the two areas to suddenly be -“consolidated”. Residents of Greetland, on reviewing the Local Plan would have no reason to -“look under” Elland and would miss the opportunity to put forth their comments. Within the -“Settlement Hierarchy” the villages of Greetland/West Vale are not even listed, but the villages at either end of the Greetland (Holywell Green and Barkisland) are listed as Neighbourhood/Small rural areas. In connection with this, there are also questions as to true increase in the amount of housing stock for the Greetland area. In the Councils calculation for -“Distribution of House Growth” (Table 3 Infrastructure Delivery Plan 2019) it shows Greetland, along with Elland, Holywell Green & Stainland to have a growth of 8.21%. However, if Greetland and West Vale are viewed on their own ; which they should be ; using the latest Polling District Figures, the increase in housing stock is around 20%. This is too much for a village of this size and with such limited infrastructure. The Council also appear to have -“gone against” a number of policies set out in the National Policy Planning Framework such as: When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. The council have not demonstrated that development of this Green Belt will outweigh the harm. The Council have simply created a vague list of possible ways to -“mitigate” problems, most of which have no concrete or sound basis and in some cases are just totally incorrect. When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. The land proposed for development is used as a natural storage area which controls the amount of water going down to Black Brook and ultimately helps prevent even more flooding down the valley.

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

Sound Reason:

**LOSS OF GREEN BELT** The site is currently designated as being in an area of Green Belt and in a recent survey it was seen to perform well in all areas apart from one. This area of Green Belt is also classified as being highly sensitive. In 2018 the Council deemed that this area of land was of such high importance, that it should be removed from the local Plan and yet now feels that the land is suitable for development. The council have not demonstrated any sound reason for this reversal, other than more land is required. The council have also failed produce any evidence, to show that all available Brownfield sites have been exhausted. Indeed, when challenged, they seem unable to produce any current information with regards to Brownfield availability. This site, currently provides a strong boundary which prevents urban sprawl. The developer (Keyland, Delivery Statement 2017) states -“the site does not serve any Green Belt purpose” ; “ This is at complete odds to the Council Survey which clearly states the land performs strong in all but one



area. Removal of this Green Belt land could, set the precedence, for removing even more of the land from the Green Belt and for development to take place all along the valley. Any development of this Green Belt area would have a major impact on the landscape and dramatically change the character of the locality forever. The development of this area would also mean a considerable loss of Open Space. The Council have stated in their report that removal of this land would have -“no loss/no impact” on the area. There seems to be no consideration that taking the Saddleworth Road Development as a whole, would mean a loss of nearly 25 hectares of open Green space which would have a detrimental effect on the local community. The area is regularly used by walkers, cyclists, horse riders and families. The area is becoming even more popular due to a number of initiatives by the owners of the industrial plant. The site has a public right of way to the west of it. Whilst the developers have stated that this will be retained, it does not take into account what effect the development would have on the character and tranquillity of this area. Walking through a housing estate is not the same as walking through untouched green belt fields.

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**ENVIRONMENTAL HEALTH** The Southern edge of proposed site is within 65 metres of Industrial Premises. In 2005 Planning permission on this site was refused, due to the potential effect of noise, dust and odours, from the industrial site, on the occupiers of the property. The council also went on to say that -“the land currently provides a good stand-off between conflicting land uses” In the original site report the Environmental health once again would not support the site for residential development but has now changed their mind even though the situation is the still the same. This is concerning. The creation of so many houses is going to have a large impact on the amount of pollution created. The development, across all the sites on Saddleworth road, has the protentional to add over 1000 cars to the road. Currently pollution figures are not collected for Saddleworth Road due to -“its open nature” allowing pollution to disperse. However, this natural -“escape route” will be eroded if this considerable area of land is developed. Currently traffic can be cued nearly half a mile up Saddleworth Road waiting to get through the traffic lights in West Vale. The possibility of an increase in cars will mean more cars on the roads, with more engines idling and pumping out more pollution. This is particularly worrying due to the local infant school being next to the road. Monthly Pollution readings for West Vale obtained from 2019 Air Quality Annual Status Report show that these monthly readings regularly exceed the 40mg/ limit, which has been set by the Council. More traffic will only increase these numbers which will be against their own targets.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

## **Main Issues and Council Response**

### **Legal Compliance**

Main Issues:

1. The proposal does not meet para 177 NPPF nor the many planning guidelines and advice given on environmental and social factors.
2. The Plan has not been prepared in line with the Statement of Community Involvement.
3. Question whether the Sustainability Appraisal has been prepared properly or used effectively.
4. Development will increase flood risk on the site and downstream. Natural springs on site. The Plan does not comply with NPPF in this regard. No reference to flood mitigation.
5. Council should demonstrate that brownfield sites have been considered.
6. No legal justification for releasing land from Green Belt. Objectively assessed need does not amount to exceptional circumstances. Lack of exceptional circumstances.
7. Loss of Green Belt, open space and countryside cannot be mitigated against.
8. Ineffective public consultation, and complexity of the information released. No opportunity for local

councillors to discuss increasing the housing requirement.

9. Ecology - impact on ecology, including around Black Brook.

10. The housing requirement should be revisited in light of Brexit.

11. Council has failed to demonstrate that development will not negatively effect existing communities.

12. No plans in place for economic development.

13. Cumulative impact of development. Unfair distribution/disproportionate amount of development in Greetland.

14. No sound reasons why this site has been reintroduced at this stage.

15. Development of the site will have a negative impact on mental health.

16. The presence of a housebuilder or developer on board should not be a reason to select a site for allocation.

17. Infrastructure - Lack of/pressure on existing amenities, services and facilities in the local area, e.g. schools, shops, doctors, utilities, public transport.

18. Local road network, specifically congestion and capacity particularly at West Vale. No assessment has been undertaken of the local road network.

19. Increase air pollution.

20. NPPF largely ignored.

21. Loss of public right of way.

22. No detail on mitigation measures for adverse environmental impacts.

#### Council's Response:

1. It is not clear in what regard the Local Plan does not meet para 177 of the NPPF. The plan has been drawn up following the NPPF and the regulatory framework.

2. The Plan is considered to meet the requirements of the Statement of Community Involvement and the Regulatory Framework regarding consultation.

3. This issue has been responded to under 'Soundness'.

4. This issue has been responded to under 'Soundness'.

5. This issue has been responded to under 'Soundness'.

6. This issue has been responded to under 'Soundness'.

7. This issue has been responded to under 'Soundness'.

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).

9. This issue is responded to under 'Soundness'.

10. This issue is responded to under 'Soundness'.

11. The Local Plan is supported by a large amount of evidence, and together with the site assessment process, it has been demonstrated that the level of housing growth can be accommodated. The Local Plan is supported by the Infrastructure Development Plan which sets out the infrastructure requirements resulting from the growth proposed in the borough. It is a compendium of projected infrastructure provision and it helps to ensure that this infrastructure is provided in a timely manner and in a coordinated and sustainable way.

12. The Council considers that the assessments undertaken are consistent with Regional, sub regional and local growth strategies, as evidenced at Examination Stage 1 Hearings. The Council's Inclusive Economic Strategy was adopted in 2018 and sets the framework for the delivery of aspirations for the period 2018-2024 in line with its Vision for 2024.

The Council is satisfied that the Local Plan meets the employment needs of the borough, and includes a number of employment and mixed use allocations to contribute to meeting this need.

13. This issue has been responded to under 'Soundness'.

14. The Site Summary in the Site Assessment Report explains why this site is being proposed as an Additional New Housing Site.

15. This issue has been responded to under 'Soundness'.

16. This issue has been responded to under 'Soundness'.

17. This issue has been responded to under 'Soundness'.

18. This issue has been responded to under 'Soundness'.

19. This issue has been responded to under 'Soundness'.

20. It is not clear in what regard the Local Plan is not NPPF compliant.

21. This issue has been responded to under 'Soundness'.

22. This issue has been responded to under 'Soundness'.

## **Test of Soundness**

### **Main Issues:**

1. Local road network, specifically capacity and congestion. Development along Saddleworth Road will have a detrimental impact on the West Vale junctions West Vale and at Ainley Top/M62, further exacerbating existing issues. Road safety issues linked to school drop off and pick up. Mitigation measures

are not deliverable.

2. Cumulative impact with other housing sites in the locality.

3. Ecology - Impact on wildlife including deer, fox, and bats, species within the Black Brook such as herons, dippers, trout and the Wildlife Corridor. Impact on UK BAP Priority Habitat.

4. Infrastructure - Lack of/pressure on existing amenities, services and facilities in the local area, e.g. schools, shops, doctors, utilities, public transport. Journey times to facilities will be longer than stated due to congestion arising from the development of the site. Combined sewer overloads discharge into the Black Brook. No current plans to upgrade the sewer system. Lack of ability for schools to expand. Lack of committed investment.

5. Flooding - increased risk of flooding on site and downstream, including from underground springs. Poor drainage. Does not comply with current policy and legislation on flooding. Site is a natural and essential soak away. Poor drainage including overloaded combined sewer outflows. Complex water system with natural springs, knock on effects elsewhere. Clay soil in the area make SuDS unsuitable. Houses should be directed to areas at lower risk of flooding.

6. Lack of consideration of brownfield sites. The site at West Vale Works and the land vacated by Freudenberg should be included in the Local Plan. The Council should use its delivery vehicle to develop brownfield sites. Lack of Brownfield Land Register.

7. The Plan does not provide realistic mitigation for issues such as green belt loss, drainage/flooding, ecology and infrastructure.

8. Loss of Highly Sensitive Green Belt and lack of exceptional circumstances. Need to demonstrate consideration of alternatives. Result in coalescence between Greetland and Barkisland. Densities on other sites should be increased to reduce the need for Green Belt release.

9. Creation of Urban Sprawl - impact on health and wellbeing, increase in pollution, increased car dependency.

10. Impact on air quality and light pollution. Air pollution particularly impacting on children. Impact of noise pollution from adjacent employment site. Environmental Health views have changed from previous consultation. Monthly readings of air quality in West Vale regularly exceed the limit set by the Council. Noise pollution arising from increased traffic. Development goes against Climate Change Emergency.

11. The Sustainability Appraisal scores would suggest there are two more suitable sites which should be replacements for LP0952 and LP0177. Question application of the Sustainability Appraisal in the site assessment process. The SA has not been mapped or measured, with specific relation to ecosystems mapping.

12. Sites should be allocated that in more suitable locations, nearer amenities.

13. Sites should be allocated to meet needs of the older population.

14. The additional local plan sites will be to meet the needs of "incomers". The mix of new homes will not meet the needs of local people.

15. There are no sites for employment in the Greetland and Stainland ward. This will increase commuting.
16. Loss open space. Impact on public footpath. Impact on health and wellbeing.
17. The Local Plan should be paused until the Brexit transition period has ended and the effects on growth can be better understood. Objectively assessed need is too high as it relates to out of date population projections, which have been superseded by lower ONS projections. Housing requirement is overstated.
18. Has the Council asked other authorities to accommodate some of Calderdale's housing requirement?
19. Cumulative impact of development. Unfair distribution/disproportionate amount of development in Greetland.
20. Allocation at odds with the need to deal with environmental and climate change issues.
21. Loss of agricultural land.
22. Site is outside the settlement envelope and would be an intrusion in the open landscape. Would be an isolated form of development.
23. Concern that this site has been unfairly assessed.
24. How is the archaeological interest going to be preserved?
25. The presence of a housebuilder or developer on board should not be a reason to select a site for allocation.
26. Potential for increased crime in the area.
27. Where is evidence that the Northern Powerhouse will generate unprecedented economic growth?
28. The Plan fails to comply with the overarching principles of the NPPF.
29. Economic assumptions should be revised, resulting in lower levels of housing required. Employment estimations are over exaggerated, particularly in retail, health care and public services.
30. Settlement hierarchy work does not refer explicitly to Greetland and West Vale.
31. The SA has not been mapped or measured, with specific relation to ecosystems mapping.
32. Increase densities on other allocations.
33. Site access - suggested access may not be achievable as Gate Head Lane is a private road.
34. Impact on heritage assets.
35. Support for allocation of the site, but concerns raised over aspects of the site allocation policy - some site specific considerations lack flexibility, overly prescriptive, unjustified, not achievable.

Council's Response:

1. The Council considers that the evidence submitted supports and justifies the content of the Local Plan. The Council has commissioned transport modelling that is robust and fit for purpose. A Transport Assessment in any planning application would need to assess impact on local road network. The Council considers appropriate mitigation measures have been provided as detailed in the 'Reports Required' and 'Site Specific Considerations'. 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.
2. 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.
3. Natural England have highlighted the presence of deciduous woodland (UK BAP priority habitat) to the south of the site which should be protected. The Preliminary Ecological Appraisal, conducted in March 2017, notes that the habitats consist of improved neutral grassland, hedgerows, trees and plantation woodland. In addition, a small part of the site in the south west corner lies within the Wildlife Habitat Network and most of the southern boundary lies immediately adjacent to this network. With the various mitigation measures specified however, it is unlikely that there will be a significant adverse ecological impact.  
Policies within the Green Infrastructure and Natural Environment chapter of the Local Plan, specifically Policy GN3, set out a clear and positive strategy to ensure the Council effectively manages its natural environment. Additionally, BT3 - Landscaping, ensures that new development integrates appropriately into its surroundings, contributes to the character of the area, and enhances local biodiversity.
4. The Infrastructure Delivery Plan is a compendium of projected infrastructure provision and it helps to ensure that this infrastructure is provided in a timely manner and in a coordinated and sustainable way. It sets out the infrastructure that will support the level of development that is proposed in the Calderdale Local Plan. The IDP is a living document, updated on at least a yearly basis and contains a chapter on healthcare, education provision, utilities and public transport. Yorkshire Water has a responsibility to supply potable water and take away waste water. Phasing of development may be necessary to enable improvements to the capacity of some WWTW's.
5. A Flood Risk Assessment would be required in order to assess any risk of flooding and propose mitigation measures to reduce such risks. As the site is located 100% within flood zone 1 however, the Council's Drainage and Flooding Section consider that with mitigation, development would be acceptable. 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.  
With regard to clay soil being unsuitable for SuDS, it should be noted that many different SuDS techniques can be implemented. As a result, there is no one standard correct drainage solution for a site.
6. The allocation process requires a willing land owner and developer in order to demonstrate the deliverability of the sites and therefore whilst there are aspirations to use as much brownfield urban land as possible this may not always be demonstrably deliverable. In terms of the site assessment process, in order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area, only using the most sensitive Green Belt when all alternative sites were used. The site referred to (West Vale Works) is an allocation in the Local Plan -

LP1088. With regards to the Freudenberg site, the site has not been assessed in the Local Plan. The Council has never received a site submission for this site. If this site does come forward for residential development in the future, it will contribute to meeting the housing requirement as a windfall site. The Council is using its delivery vehicle to deliver a number of Local Plan site allocations. The Council's most up to date Brownfield Land Register was published on 31 December 2018. A revised register is currently being prepared.

7. The Council considers appropriate mitigation measures have been provided as detailed in the 'Reports Required' and 'Site Specific Considerations'.

8. The purpose of the Green Belt Review is to provide an understanding of the current strengths and weaknesses of the existing Green Belt and provide the basis for recommendations to change the Green Belt where appropriate. In order to assess Green Belt land against the NPPF purposes, a set of questions for each purpose has been developed including the need to prevent neighbouring towns from merging into one another and to preserve the setting and special character of historic towns.

In terms of the site assessment process, in order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area, only using the most sensitive Green Belt when all alternative sites were used.

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. 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.

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. 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'<sup>7</sup> published in 2000. These have been used in assessing the housing allocations in order to determine indicative site capacity.

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. The policies within the Local Plan support the achievement of the Local Plan Transport Objective, 'To ensure the provision of a sustainable, safe and efficient transport system which reduces car dependency and improves quality of life through a balance of promoting economic growth, enhancing environments and improving transport access for communities'. To achieve these objectives the Council is developing a range of strategies and interventions, and the Local Plan has a role to play in supporting these, but also ensuring development proposals meet these objectives and contribute more widely to an integrated 'active mode' network.

10. Environmental Health has not raised any concerns in terms of the impact of development on air or light pollution levels in the area. Policy EN1 of the Local Plan seeks to reduce the amount light pollution that would pose an unacceptable risk to the local amenity. Additionally, 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. Further consultation has been undertaken with the Council's Environmental Health Section in light of the submission of a Noise Impact Assessment Report and Air Quality Assessment Report. In light of this



evidence, Environmental Health do not object to the allocation of the site for housing.

11. The SA is part of the Local Plan preparation process and its purpose is to inform the development of the plan; it is not the sole contributor to proposing or rejecting site allocations. The methodology for assessing the impacts was part of the SA Framework that has been developed over a number of years. The SA Framework has been subject to a number of public consultations.

12. In order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area, only using the most sensitive Green Belt when all alternative sites were used.

13. The Council considers the Local Plan meets the housing needs of all groups of the population. Policy HS4 in particular addresses the needs of older and disabled population.

14. The Local Plan seeks to balance the housing growth with economic aspirations, to reduce in-commuting. In addition, Policy HS3 seeks to ensure that new developments will provide for a mix of homes which meet housing need.

15. The growth of employment alongside new homes within Calderdale will provide opportunities for locally based employment reducing the need to travel. LP0059 is allocated for employment use (B1) and falls within the Greetland and Stainland ward.

16. The site is currently designated as greenbelt but also performs the function of a natural/semi-natural open space. An assessment of open space in the area shows that there are sufficient alternative natural/semi-natural areas within the catchment of this site to meet the adopted standards. However if the site is designated for housing, open space would be required as part of any development since there are deficiencies in other typologies. Where sites contain public footpaths, schemes will be expected to incorporate this in their layout, or if ultimately necessary, arrange for a suitable diversion.

Chapter 12 of the Local Plan (Health and Well Being) and guidance contained within the NPPF highlight the role of the planning system in supporting health, social and cultural wellbeing and creating healthy, inclusive communities. A health impact assessment (HIA) helps to ensure that health and wellbeing are being properly considered in planning policies and proposals.

17. The Planning Practice Guidance states that the 2014-based household projections should be used as the starting point for determining the level of housing provision. It also states that the 2016-based household projection should not be used. Where a recently produced Strategic Housing Market Assessment provides a figure greater than the standard method this is to be taken into account. Following the stage 1 hearings the Inspector expressed concerns around the housing figure in the Publication version of the Local Plan and requested the Council consider undertaking further work to assess the implications of housing need and requirement figures which align more closely with the Plan's economic strategy. Table 1 represents the outcome of this work. The implications of leaving the European Union are, as yet, unknown in relation to any impact on future housing requirements. The Government is clear that the current NPPF/PPG must be followed and also that Local Plans should be in place as soon as practicable.

18. See Submission Document SD 13 Duty to Cooperate Statement Including Statements of Common Ground (January 2019).

19. 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. The Local Plan is

supported by a large amount of evidence, and together with the site assessment process, it has been demonstrated that the level of housing growth can be accommodated. The Local Plan is supported by the Infrastructure Development Plan which sets out the infrastructure requirements resulting from the growth proposed in the borough. It is a compendium of projected infrastructure provision and it helps to ensure that this infrastructure is provided in a timely manner and in a coordinated and sustainable way.

20. The Addressing Climate Change chapter of the Local Plan, along with the sustainability section of Policy BT1 (Built Environment) sets out a clear and positive strategy for combatting climate change. The relevant policies ensure the different policy areas of the Local Plan respond to the challenges of climate change in order to deliver a sustainable future for the Borough. Other environmental issues are addressed through the relevant policies in the Local Plan and the requirements of developers as set out in the site schedules in Appendix 1 to the consultation document CC39 (Housing Requirement Update and Potential Supply, January 2020).

21. The site assessment process seeks to protect land which is of higher quality in terms of the Agricultural Land Classification. The site consists of predominantly Grade 3 Agricultural Land which is not considered "high quality".

22. The site is adjacent to the Urban Area, and it is not considered that it would be an intrusion in the landscape nor result in isolated development.

23. All sites assessments have been carried out in a consistent manner following the Site Allocations Assessment Methodology Statement, Publication Draft 2018 (EV51.1).

24. A Predetermination Archaeological Evaluation is listed in Report Required. Policy HE3 also requires proposals affecting a Class III archaeological site should conserve those elements which contribute to its significance.

25. The selection of sites has been undertaken in accordance with the Site Allocations Assessment Methodology Statement, Publication Draft 2018 (EV51.1). The presence of a housebuilder or developer was not an overriding reason for the allocation of a site. However, the Council is mindful of the requirement in NPPF to ensure the Local Plan identifies specific deliverable sites for years 1 -5, and specific, developable sites or broad areas for growth for the later years of the Local Plan, to meet housing need.

26. Policy BT5 - Designing Out Crime of the Local Plan ensures that designing out crime and designing in community safety should be central to the planning and delivery of new development. The policy includes a range of criteria that the development proposal must have due regard to.

27. The Council considers that the methodology adopted in the Employment Land Study (EV1) and the Employment Technical Paper (EV02) meets the requirements of National Planning Policy Guidance. The approach uses the Regional Econometric Model which is a complex economic database and impact model for Yorkshire and Humber, and data in the model consists of historical employment, output, productivity, population estimates and forecasts, and other labour market and environmental information. The Model provides a consistent database which underpins the economic policies of the LEP and other Districts in the Leeds City Region.

28. The Council has prepared the Plan in accordance with NPPF.

29. The Council is committed to supporting future employment growth in the District both to meet the job needs of residents and to grow the local economy, and as a member of the Leeds City Region to support the

aspirations of the Local Enterprise Partnership. The level of job growth is based on forecasts which take into account these policies, infrastructure improvements programmed under the West Yorkshire Plus Transport fund, and the M62 Enterprise Zone, and is referred to as the 'Policy on with Transport' assessment. The Council believes this is a sound basis for assessment and it provides the basis for the housing requirement assessment presented in CC21 – Modelling the economic implications of the proposed housing requirement (Turley, 2019).

30. The settlement hierarchy has not been used as the basis for distribution of development. As the Local Plan developed it was found not possible to for settlements within the higher tiers to accommodate as much growth as initially anticipated.

31. The SA is part of the Local Plan preparation process and its purpose is to inform the development of the plan; it is not the sole contributor to proposing or rejecting site allocations. The methodology for assessing the impacts was part of the SA Framework that has been developed over a number of years. The SA Framework has been subject to a number of public consultations.

32. The revised housing requirement is to be partially met through an increase in densities on some of the mixed use sites.

33. Gate Head Lane has been suggested by Highways Development Management as a potential secondary access. However, HDM have stated that if this is not possible, access can be taken from Saddleworth Road as the frontage should be sufficient to provide a new access to adoptable highway standards.

34. Policy HE1 of the Local Plan sets out a clear and positive strategy for the conservation, enjoyment and enhancement of Calderdale's historic environment and should be considered in conjunction with guidance provided in the National Planning Policy Framework, and planning policy guidance. It should be noted that this policy does not seek to unnecessarily or entirely prevent development which may affect a heritage asset. Instead, it aims to ensure that development proposals are sympathetic to heritage assets in that their significance and settings are understood, respected and either conserved or enhanced whilst safeguarding against their exploitation or endangerment. This will ensure a sustainable future for heritage assets, and for the historic environment as a whole.

35. 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.

The Site Specific Considerations are based on constraints identified in the site assessment process. The list of constraints, reports required and site specific considerations direct those wishing to bring schemes forward to the most relevant issues to address. These lists are not exclusive and other matters may arise at the detailed planning stage.

## **Duty to Co-operate**

### **Main Issues:**

1. Development of Green Belt land would effect character of the area, be detrimental to ecology and residents, and be illegal with regards to flooding and Green Belt policy. Lack of exceptional circumstances.

2. Ineffective public consultation. Limited consultation period giving insufficient time to submit objections, and complexity of the Council's website and information available.

3. Concerns about the way in which the Local Plan has been formulated and worries about the influence and involvement of major developers in selecting sites.
4. Constraints and negative effects cannot be mitigated against. Not viable to build houses here.
5. Site is a flood plain and should be removed from the Local Plan. The Plan does not conform with legislation on flood risk.
6. No evidence that the duty to cooperate has been complied with.
7. Economic forecast is out of date.
8. No evidence that all brownfield land has been assessed as per NPPF para 137.
10. Local road network, specifically congestion, capacity, road safety.
11. Increase in air pollution.
12. Infrastructure - Lack of/pressure on existing amenities, services and facilities in the local area, e.g. schools, shops, doctors, utilities, public transport
13. Ecology - impact on ecology and wildlife, includes bats, deer, foxes.
14. The Council has only liaised with Kirklees Council
15. Housing need should be transferred to neighbouring authorities.

Council's Response:

1. This issue has been responded to under 'Soundness'.
2. 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).
3. These issues have been responded to under 'Soundness'.
4. The Council considers appropriate mitigation measures have been provided as detailed in the 'Reports Required' and 'Site Specific Considerations'.
5. This issue has been responded to under 'Soundness'.
6. See Submission Document SD 13 Duty to Cooperate Statement Including Statements of Common Ground (January 2019). Calderdale is part of the Leeds City Region (LCR) and a member of the West Yorkshire Combined Authority (WYCA). The LCR has a well-established programme for joint working and cooperation at both member and officer levels – planning portfolio holders and heads of planning meeting regularly, and there is specific 'duty to cooperate' group attended by planning policy officers.
7. The Council considers that the methodology adopted in the Employment Land Study (EV1) meets the requirements of National Planning Policy Guidance. The approach uses the Regional Econometric Model which is a complex economic database and impact model for Yorkshire and Humber, and data in the model

consists of historical employment, output, productivity, population estimates and forecasts, and other labour market and environmental information. The Model provides a consistent database which underpins the economic policies of the LEP and other Districts in the Leeds City Region.

8. This issue has been responded to under 'Soundness'.

10. This issue has been responded to under 'Soundness'.

11. This issue has been responded to under 'Soundness'.

12. This issue has been responded to under 'Soundness'.

13. This issue has been responded to under 'Soundness'.

14. See Submission Document SD 13 Duty to Cooperate Statement Including Statements of Common Ground (January 2019).

15. See Submission Document SD 13 Duty to Cooperate Statement Including Statements of Common Ground (January 2019).

### **Suggested Modifications**

1. Reduce the size of the allocations.

2. Remove this site as an allocation.

3. Utilise brownfield sites. Commission survey of all brownfield sites.

4. Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development

5. Remove sites within 'most sensitive Green Belt' parcels.

6. A clear assessment of the impact of additional traffic on current infrastructure and the environment relating to air pollution and the cost of development required to keep traffic congestion at current levels.

7. A robust assessment of the danger of building on a flood plain categorised as high risk by the environment agency and the cost of development to safeguard against flooding.

8. Economic growth calculation should be reconsidered.

9. Reconsider environmental impact, habitat loss, wildlife loss, the function of Green Belt land for improving air quality needs stating, the loss of trees, at a time of climate emergency.

10. Set out to Government that the Council is refusing to accept a higher housing requirement.

11. Revisit the Plan.

12. Increase housing densities in Brighouse.

13. Amend site allocation policy by amending the first bullet point as follows: 'Provision of green and blue infrastructure on site such as SuDS, which also seeks to incorporate biodiversity and habitat enhancement and open space'.

14. Remove the wording 10-20m buffer from the second bullet point.

15. Amend the third bullet point as follows: o Existing hedgerows should be retained and restored, where possible.

16. Delete the seventh bullet point

#### Council's Response:

1. No change required - The allocation of the site is considered to be consistent with the Council's site allocation methodology and positioning in the trajectory as set out in the Housing Technical Paper. 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.

2. No change required - The allocation of the site is considered to be consistent with the Council's site allocation methodology and positioning in the trajectory as set out in the Housing Technical Paper. 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.

3. No change required - The Council is required to publish a brownfield land register which provides up-to-date and consistent information on sites that the local authority considers to be appropriate for residential development having regard to the criteria set out in regulation 4 of the Town and Country Planning (Brownfield Land Register) Regulations 2017. The Council's most up to date Brownfield Land Register was published on 31 December 2018. A revised register is currently being prepared.

4. No change required - It is considered that policies in the Local Plan will ensure that proposals for new development take account of the issues stated.

5. No change required - In terms of the site assessment process, in order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area, only using the most sensitive Green Belt when all alternative sites were used. 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. The proposed changes to the Calderdale Green Belt are clearly a last resort and have been minimised.

6. No change required - The Council's response is set out in EV05 the Air Quality Technical Paper 2018 and EV04 the Calderdale Air quality Action Plan 2018.

7. No change required - The Council considers that the evidence submitted supports and justifies the content of the Local Plan

8. The Council is committed to supporting future employment growth in the District both to meet the job needs of residents and to grow the local economy, and as a member of the Leeds City Region to support the

aspirations of the Local Enterprise Partnership. The level of job growth is based on forecasts which take into account these policies, infrastructure improvements programmed under the West Yorkshire Plus Transport fund, and the M62 Enterprise Zone, and is referred to as the 'Policy on with Transport' assessment. The Council believes this is a sound basis for assessment and it provides the basis for the housing requirement assessment presented in CC21 – Modelling the economic implications of the proposed housing requirement (Turley, 2019). Given this position the Council does not propose a modification in respect of this issue.

9. A robust assessment of the danger of building on a flood plain categorised as high risk by the environment agency and the cost of development to safeguard against flooding.

10. No change required - In order for its Local Plan to be found sound the Council must make provision for the housing requirement identified in the SHMA to be either met within the district or in neighbouring districts. As the surrounding authorities have agreed through the Leeds City Region Statement of Common Ground to meet their own housing requirement this latter option is precluded.

11. No change required - The Local Plan is currently being examined by a Government appointed Inspector.

12. No change required - The revised housing requirement is to be partially met through an increase in densities on some of the mixed use sites.

13/14/15. No change required. The Site Specific Considerations are required to minimise impact of development on biodiversity.

16. No change required. A strong and defensible Green Belt boundary is required.

## Representations

Comment ID **HRU103**

Site ref (if applicable): **LP1567**

Person ID: **1241618**

Name: **Ms Helen Chadwick-Hamilton**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

As a local resident I have received no formal communication regarding this proposed development & as per the Green Belt Policy this land should only be utilised in 'exceptional circumstances'

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

Sound Reason:

I would be keen to challenge any proposal that suggests another 450 households could be catered for within the Elland area. At present, there is one doctors surgery that cannot cope with the number of patients in its care in this area. I do not believe that local school could accommodate such an increase of additional pupils & there are not enough local activities for youngsters in the area at present, that could deteriorate further, increasing future risks for residents. Park Road is incredibly busy to traffic already, with commuters using this route as their first alternative if the M62 has any issues and Exley Lane is already congested with traffic to and from Halifax - any increase in traffic on east her of these roads would consider a safety hazard. Park road is already busy with parked cars supporting local businesses & the additional increase of well over 500 cars would have a huge detrimental impact on air pollution. I am personally concerned about the impact of further flooding if the 'steep hill' behind our property is disturbed. Also, with the impact having a building site outside my window for however many months/ years & then the beautiful green belt being replaced by a housing estate/ development - this is not what I bought my property for! I bought my property on the understanding that this was green belt land & that all wildlife/ nature would continue to flourish for many years.

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

Duty to Co-operate Reason:

If this relates to local residents being formally consulted regarding this plan, then NO I strongly object to the duty of care for this plan.

Suggested Modifications:

None

Comments:

Additional Evidence Link:



Comment ID **HRU1075**

Site ref (if applicable): **LP1567**

Person ID: **952752**

Name: **Mr Richard Lupson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The Calderdale Green Belt Review showed the site to be part of a larger area between Elland and Siddal and judged the site to be recommended not to be developed on the basis that it served 3/5 of the functions of a green belt. At some subsequent time Calderdale Council have taken it upon themselves to decide that this larger packet of land can be randomly split and conveniently reassessed to give LP1567 a lower value in the green belt. This Decision was taken without any public consultation and therefore makes this plan legally non-compliant.

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

Sound Reason:

Flooding The land designated LP1567 is officially in Flood Zone 1 with a -"1 in a 1000 year" flood risk, in reality the flooding is becoming more frequent and occurring about every three years or so. All this flooding is caused by runoff water. In 2004, 2007, 2008 and twice in 2015 and now February 2020 we were flooded by run-off water, which made a significant contribution to the flooding in Park Road. This piece of land is a vital soak for heaving rainfall in this part of the valley. In times gone by water flowed from the woods and adjacent valleys to the North and off the field now known as LP1567 to the west. The water collected in the bottom of the undulations of Park Road and Valley View. Until it drained away, traffic diverted along the rear of Valley Mills and Woodlands Road. Flooding became more frequent a line of storm drains was built along the lower edge of LP1567 which are behind my house. When this failed to cope, a pumping station was built near Valley View and when this started to be overwhelmed it was upgraded but even these pumps cannot cope with the flow sometimes. This overwhelm contributed to devastation in 2015 and 2020. Most cellars on Plains lane have pumps to remove excess water when run-off is high. Building on this land would swap its soak up sponge effect for roofs drives and roads resulting in a swift run-off from this extensive area. There are several springs in the field and these flow in times of heavy rain. There is also run off from Exley Farm which has increased in recent years due to increased industrial type activity there (stone and hard-core recycling and a log business), diversion of older water courses and conversion of fields to post farming brownfield sites. Flooding has been a major issue in Calderdale recently with the Boxing Day Floods of 2015 and again in February 2020. There have been improvements to the water courses higher up the Calder Valley since then, which will result in water flowing even more swiftly from the upper valley to the lower valley. Park Rd area immediately below these fields was badly affected at this time but it could easily be forgotten that Park Road was flooded 2 weeks earlier on December 12 2015 and also in January 2008, and June 2004. Building on this land constitutes criminal neglect. There doesn't appear to have been sufficient flood risk assessment on this site. Mitigation suggested for this site is suggested as Green Infrastructure, but it is difficult to imagine that green roofs could improve on what is already there. A flood risk assessment is still required for this site. How can this site be re-introduced to the Local Plan without that information? Pictures attached in PDF files show run off issues from 2004, 2008 and 2020. Green Belt Calderdale Green Belt review judged this site along with neighbouring fields as most sensitive green belt. It met 3/5 of the Governments criteria for green belt. Slicing a bit of the site off with no existing clear boundary is not acceptable. This is another example of a lazy approach to planning ; developing part of the site will affect the whole site, Development will contribute to urban sprawl as there are existing clear boundaries at the moment. Once Green Belt land has

gone, it has gone forever and planning needs to consider much longer-term implications than housing for 15 years. The Prime Minister said in February 2017 that Green Belt land should be protected. Greenbelt should only be considered when all other options have been exhausted. The RAG system used in the Sustainability Appraisal appears unsound in this regard with some sites which score higher than this site being filtered from further consideration with little justification.

**Accessibility** I presume the journey times quoted in the site report are by car. Is this acceptable? It is a 20 minute walk to Morrisons from the proposed only entrance to the site, never mind the far end. The site is currently not served by any regular all-day bus service. The only service connects with Elland, which would mean transferring to go anywhere else. There is only one access point to the site which would make the nearest shop a mile away and the town centre further away. Schools are still further away. The only way to Elland is to cross the already congested A6025 and Elland bridge, both designated as significant barriers to accessibility. None of this adds up to a likely hood of achieving other parts of the local plan to do with alternatives to using a car for transport. The site is unsustainable from this point of view.

**Highways** It is no longer clear where access to this development to be. Exley Lane only has access to Elland and is designated a no-through-road to Halifax, with single track status in many points. The development will generate upwards of 1200 journeys a day onto the junction with Park Road, which, due to the by-pass bridge and a railway bridge offers no room to improve the access. It is also associated with a by-pass slip-road. At peak times this junction is significantly congested with traffic backing onto the by-pass on occasions. The transport assessment for the site suggests that there is mitigation for this extra traffic, but it is hard to imagine what that might be and it certainly doesn't appear in the plan. The potential developers appear to have undertaken a "traffic survey" to assess traffic at the junction of both Exley Lane and Plains Lane with Park Road. It should be noted that this was undertaken during school half term in October 2018 and was therefore not representative of normal traffic. It can take 20 minutes to exit Plains Land onto Park Road towards Elland at peak times. Lorries still use Park Road but fail to negotiate the railway bridge and have to turn around and head back to Brighouse. This happens 2-3 times a week causing traffic difficulties for up-to 30 minutes. Lorries still use non-updated sat navs which take them up Exley Lane until the cant turn around.

**Ecology** The site is a designated wildlife corridor and designated green belt (see below). It provides a home for deer, foxes, rabbits, geese, owls and bats and many more creatures of smaller size. It also provides safe routes between other safe spaces such as Elland Park Woods and the woods above the by-pass. The land is currently farm land used for grazing and has been certified organic by the Soil Association in the recent past. I believe the lambs currently grazing there will be on your table as organic lamb. This is prime farm land which is rare in this part of Calderdale. In 2019 a new family of a doe and three fawns passed through the site grazing every day for a month or more.

**Open Space** There is minimal open space in Elland, once it's gone it's gone for ever. We need to seriously think about our children and their children before we let go of spaces like this. These fields can be seen from many parts of Elland and beyond and have a significantly uplifting environmental impact for everyone, not just those living round the edge of them.

**Housing Services** The Site Report states - "Site has difficult access issues that would need to be overcome to be considered for any type of housing"

**Employment Land Study** The Site Report states - "The site is part of the Green Belt and meets 3 of the 5 identified purposes of Green Belt land, particularly, as it performs an important role in safeguarding the countryside from encroachment. Therefore, it was recommended in the Green Belt review that the site be retained as Green Belt. The site should therefore not be allocated for employment use."

**By the same criteria** why should the site be available for any use other than how it is already used.

**Other Considerations** This development contrasts strongly with other large developments within the Local Plan. The other major sites attract extra funding to help develop wider roads, pavements, green corridors and even space for shops. This site is isolated from key infrastructure by the major barriers of the River Calder and the Calder and Hebble Navigation canal. There is only 1 route between this site and any features which may be of use to residents ; specifically shops, doctors, schools, places of worship and so on. The local schools are already fully subscribes as are the doctors surgery which is still reeling following absorbing patients from a single handed practice which closed.

**Deliverability** This site appears to be a lazy short cut to delivering a plan. It ticks off a large number of houses on one site. A larger

development in the similar area was removed following the Green Belt review, so we could say phew thank goodness we don't have 1700 houses here. Throughout the plan and especially here there is little evidence of considering brownfield sites, never mind preserving green belt land. There is an unfair emphasis of development on Elland: overall there is a planned 5% uplift in housing, but Elland is expected to sustain a 15% uplift. The people of Elland feel to be victims of unfair treatment as we have no local representation. Other areas (e.g. Brighouse, Hebden Bridge) have town councils and many villages have Parish Councils. The site has been identified as having a number of constraints in the Sustainability Appraisal but these are noted as "mitigated", however there is no detail as to how they can be mitigated and nothing in the plan to develop an appropriate infrastructure. In my view this makes this development UNDELIVERABLE! I STRONGLY OPPOSE BUILDING ON THIS LAND.

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

Duty to Co-operate Reason:

Each stage of consultation has taken place with a strong reliance on the public having access to the internet and having sufficient skill to negotiate a clumsy portal interface. Publicity has been restricted to electronic communication with those people who successfully registered to use the portal. I have neighbours who submitted written objections in earlier rounds which have not been added to the portal. We were told that comments (132) were not reviewed because this site was removed from the Local Plan. The site has been put back into the plan with no evidence that our previous comments have been considered.

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609695>

Comment ID **HRU1128**

Site ref (if applicable): **LP1567**

Person ID: **958304**

Name: **Mrs Jennifer Sykes**

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:

Loss of Greenbelt Land Once it's gone, it's gone. We cannot bring back our green belt land once it has been built upon. The land on this site is precious to Elland and the wider wider community both visual and physical for both humans and wild animals. This development would create urban sprawl as this is the only land separating Elland from Halifax. As others have stated The NPPF at a paragraph 133 states that - "The Government attaches great importance to Green Belts" and at paragraph 136 that - "Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified" At paragraph 144 it further states - "local planning authorities should ensure that substantial weight is given to any harm to the green belt" and at paragraph 145 - "a local planning authority should regard the

construction of new buildings as inappropriate in the Green Belt "Building on these sites is contradictory to all of these statements I don't believe there are any exceptional circumstances evidenced or justified in these proposals to allow building on this Greenbelt land.

**Increased risk of flooding** I have lived within this community for all of my life, the area has suffered extreme and severe flooding on 2 occasions, the latest being only a couple of weeks ago in February 2020 with Storm Ciara and the other on boxing Day in 2015. The effects are plain to see and are all over social media for anybody to review many homes have been affected and if more houses were built in this area would only increase this problem. Paragraph 155 of the NPPF states that 'Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas of highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere 'This site is with a high risk flood area. The Greenbelt Land within this proposed site acts as a natural soak away of water. Flood plains have already been removed from this area when Lowfields were turned into the business park. I urge the decision makers to think logically and show some common sense in realising that you cannot keep taking away the natural soak away's without having devastating consequences. The frequency of flooding is only set to increase with the change in weather conditions we are experiencing through global warming. The natural flood defense which these fields give are therefore even more important to our communities. To build on these sites would not only guarantee increased flooding issues and misery for residents and local businesses but cause increased expenditure for the council and local authorities as they will be required to assist with clean up operations, as has been seen over the last week or so in many parts of Calderdale. Paragraph 158 NPPF states 'Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding 'I can't see any evidence that the planning authority has exhausted other options of seeking development sites in lower risk flooding areas in particular on brownfield sites.

**Loss of Wildlife Habitats** We often wild deer running through the fields, squirrels, owls, bats and foxes in this site. As well as the farm animals which graze these fields and provide a livelihood for the farmers. Paragraph 177 NPPF states that 'The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site'. I would argue that building on the land will be extremely detrimental to the wild animals within the area. No mitigation can prevent the impact of urban sprawl and the destruction of their natural habitats.

**Lack of Infrastructure** The local schools are already full, GP surgeries are full and are unable to cope with the current appointments, and local NHS dentists have long waiting lists. Adding an additional 450 houses and the associated increase in residents is simply unsustainable. Exley Lane is supposedly an 'access only' road. In parts it is very narrow lane with dry stone walls at either side. It is already not wide enough in parts for 2 cars to pass without having to come to a virtual standstill. It is a known 'rat run' to Halifax which is unable to be policed. The exit from the A629 onto Exley Lane has numerous collisions a year and of which myself as a child have been in a car which has been collided into which is not a nice experience. It is certainly not wide enough to create an access point for 450 houses. With additional houses we can estimate that this will probably increase vehicles by at least a further 900 cars. I don't believe the current road infrastructure would be able to cope with this increased number of vehicles all trying to gain access on to Park Road and the A629. I can't see anything in the proposals to remedy the lack of infrastructure. Traffic congestion, air pollution and noise pollution Exley Lane and Park Road are already congested routes, especially during peak hours. Even with the Exley Land have an 'Access Only' road status. With the potential of an additional 900 vehicles requiring access to travel across Elland Bridge or to A629 slip road to Halifax, the traffic situation would become even more problematic. We already experience long delays waiting to turn onto Park Road out of Exley Lane onto the extremely heavy traffic flow during peak times. With the building of 450 houses on this site, the 'Access only' status would become even more impossible to enforce, with traffic opting to use this route to Halifax instead of the more congested Park Road and A629 route. Air and noise pollution is also a massive consideration due to the increased use of cars within this area. In January 2019 Calderdale Council

declared a climate emergency for the area. I can't see anything the proposals to remedy this problem.

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

Duty to Co-operate Reason:

Suggested Modifications:

Regarding soundness of the plan, especially in relation to the flood risk, the only acceptable outcome is for the land to remain Green Belt.

Comments:

Additional Evidence Link:

Comment ID **HRU114**

Site ref (if applicable): **LP1567**

Person ID: **1241700**      Name: **MR RODGER SHACKLETON**      Organisation:

Agent ID:      Name:      Organisation:

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

Legal Compliance Reason:

EXLEY LANE IS AT PRESENT "ACCESS ONLY". END OF PLAINS LANE IS AT ENTRANCE TO PUBLIC R,O,WAY TO WOODLAND.

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

Sound Reason:

DEFINATELY NOT SOUND. ELLAND IS THE ADDRESS FOR THE SITE, ELLAND IS ONLY ACCESSIBLE VIA ONE ROAD FROM THE SITE, THIS IS OVER THE VERY NARROW AND ALREADY FULLY USED TO CAPACITY "ELLAND BRIDGE". SO , 1 WAY IN 1 WAY OUT, SAME FOR ALL. UNSOUND PLAN INDEED. IN SHORT, LACK OF SCHOOLS (ALL AGES). LACK OF DOCTORS SURGERY'S, HOSPITALS FUTURE VERY UNSURE. VERY LIMITED FORE SERVICE, LIKEWISE AMBULANCE SERVICE. UNSOUND PLAN INDEED. NEW ROADWAYS, JCT 22 TO KING CROSS AND CALDER VALLEY ETC TO BE BUILT IN NEAR FUTURE, STARTING AUTUMN 2020. UNSOUND PLAN INDEED, MUST OBVIOUSLY WAIT AT LEAST 10 YEARS BEFORE RECONSIDERING. ALL LARGE HGV'S HAVE TO STOP TO NEGOTIATE THE RAIL BRIDGE AT BOTTOM OF EXLEY LANE/PARK ROAD ELLAND, AS ONLY ONE WAY TRAFFIC IS POSSIBLE DURING HGV PASSING THROUGH IT. UNSOUND PLAN INDEED. WILDLIFE,MANY SPECIES AROUND,IE;DEER,HARE,BATS, WE EVEN HAVE A FAMILY OF BLACK FOXES, (SEE ON YOUTUBE) VERY RARE. NOT TO MENTION THE ADDED POLLUTION AND SAFETY CONCERNS. PLEASE SORT OUT AND BUILD THE INFASTRUCTURE FIRST, THEN RE-THINK THE ISSUE.

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

Duty to Co-operate Reason:

CO-OPERATE, MAYBE A JOKE, OR DID WE MISS IT, JUST TRY TO KEEP AN APOINTMENT FROM ONE SIDE OF THE TOWN" SPLITTER", (ELLAND BRIDGE) TO THE OTHER, IT IS IMPOSSIBLE TO NOT SIT IN A POLLUTING TRAFFC QUEUE TODAY. SO ANY FUTURE EXTRA AVOIDABLE TRAFFIC WOULD SURELY BE A GREAT HARM TO OUR ALREADY OVERTAXED ENVIRONMENT. COME ON CALDERDALE COUNCIL, CO-OPERATE AND SER A

PRECEDENCE FOR THE NORTH, KEEP IT UNIQUE, FOR OUR KIDS AND THEIRS. PLEASE.

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1142**

Site ref (if applicable):

Person ID: **1243893**

Name: **Mr Frank Lockwood**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I accept that as a responsible Council you are complying with the law, however as having moved to Valley Mill recently I only found out about the resubmitted plan through face book I feel disappointed by your lack of transparency with the residents that live in the area affected your actions do not inspire trust.

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

Sound Reason:

Most definitely not, having looked back at why the last application was rejected You have done nothing of any substance to warrant a resubmission to develop the area. How is the water runoff from 450 houses going to be managed, where will it go, into drains and a canal that will be already full from flooding? You must be aware that apartments at the back of the mill are below ground level, is there any point building homes on the hill behind the Mill and effectively dehousing the residents at the base of the hill when we get the next big storm. plans should be put on hold until you have effectively dealt with the flooding issues currently affecting the area and you can honestly tell people that they will not suffer any more problems.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1146**

Site ref (if applicable): **Lp1567**

Person ID: **1243901**

Name: **Miss Sue Glew**

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:

No I would be keen to challenge any proposal that suggests another 450 households could be catered for within the Elland area. At present, there is one doctors surgery that cannot cope with the number of patients in its care in this area. I do not believe that local school could accommodate such an increase of additional pupils & there are not enough local activities for youngsters in the area at present, that could deteriorate further, increasing future risks for residents. Park Road is incredibly busy to traffic already, with commuters using this route as their first alternative if the M62 has any issues and Exley Lane is already congested with traffic to and from Halifax - any increase in traffic on east her of these roads would consider a safety hazard. Park road is already busy with parked cars supporting local businesses & the additional increase of well over 500 cars would have a huge detrimental impact on air pollution. I am personally concerned about the impact of further flooding if the 'steep hill' behind our property is disturbed. Also, with the impact having a building site outside my window for however many months/ years & then the beautiful green belt being replaced by a housing estate/ development - this is not what I bought my property for! I bought my property on the understanding that this was green belt land & that all wildlife/ nature would continue to flourish for many years.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1147**

Site ref (if applicable): **LP1567**

Person ID: **1243712**

Name: **Mr John Brewer**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

I support all posted comments .

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

Sound Reason:

I support all posted comments

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

Duty to Co-operate Reason:

I support all posted comments

Suggested Modifications:

I support all posted comments

Comments:

Additional Evidence Link:

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Comment ID **HRU1159**

Site ref (if applicable): **LP1567**

Person ID: **952376**

Name: **Mrs Sophie Dowson**

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 in question is most sensitive green belt, Calderdale council have not fully explored brownfield alternatives or less sensitive green belt sites, Green Belt should not be developed on unless all other avenues have been exhausted. The site fulfils its purpose to prevent urban sprawl between Elland and Halifax. It is a home for wildlife, which include wild deer which are seen regularly, geese, bats, foxes, rabbits to name but a few. Once this land is lost to development it is gone forever. One of the most important factors to consider is that the field acts as a flood plain, this land has flooded heavily in the boxing day floods, and the more recent storm Ciara and Dennis and any time there is rainfall, the cellars of most properties on Plains Lane flood already, if the flood plain is developed on it will not be able to absorb the water and it will force more flooding to properties and on to Park Road which has flooded numerous times recently with devastating consequences to homes and businesses, and unlike Mytholmroyd and Hebden Bridge, Elland has received no flood prevention scheme. The development of this site would also cause major disruption to traffic, again there are no plans to improve Ellands road transport infrastructure, there is limited bus services and already congested roads, there are also not enough Schools, doctors surgeries, etc to provide for this influx of new residents, unlike the urban development in Brighouse where all these factors have been accounted for.

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

Duty to Co-operate Reason:

Suggested Modifications:

Remove site LP1567 from Housing allocation and retain as most sensitive Green Belt

Comments:



Additional Evidence Link:

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Comment ID **HRU1168**

Site ref (if applicable): **LP1567**

Person ID: **960280**

Name: **Ms Christine Elliott**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

This plan was dismissed after long discussions and objections and appears to have been added under less distributed information than last time. The objections were all upheld last time so this appears to have been sneaked in again. I understand that you have to comply with Gov remits to provide land for housing but this piece is definitely not viable. I also understand the need for housing in Calderdale but Elland is already bursting with new properties.

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

Sound Reason:

Flooding the land is already subject to flooding and the house on Plains Lane take the brunt of that but with houses and concrete on there it will mean more water on Park Road which is already suffering. Green land houses would be detrimental to the wild habitat and the environment. Surely some more brown field sites could be found? Infrastructure There is not enough infrastructure already in the area so these houses would increase the problems with waste removal, utility services and environmental issues. Noise from surrounding factories is already a problem Highways The roads will not sustain much more traffic, Park Road is already now a very busy road, and is subject to landslip and flooding.

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

Duty to Co-operate Reason:

I do not feel the residents have been adequately informed and consulted

Suggested Modifications:

Find more brown sites convert more mills

Comments:

Additional Evidence Link:

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Comment ID **HRU1266**

Site ref (if applicable): **LP1567**

Person ID: **1243936**

Name: **Mrs Anne Richardson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Floodplains, ancient woodland , greenbelt.

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

Sound Reason:

Flooding, local infrastructure not in place for additional 450 homes. Traffic congestion is already high and can only be worse if an additional 900 or so vehicles accessing to Elland Bridge or the A629 slip road to Halifax, and real difficulties accessing to and from Valley Mill, Park Road, the Crematorium and the other businesses adjoining.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1290**

Site ref (if applicable): **LP1567**

Person ID: **1125467**

Name: **Mrs Gemma Hill-Wood**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Failure to plan for community engagement Ensuring that the plan rests on credible evidence base

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

Sound Reason:

Site identified on the Calderdale Local Plan as adjacent to Exley Lane North Elland. LP1567 site was previously rejected, objections on the proposed revised plan remain due to the following: The proposed development is not in keeping with the stylistic context or scale of the local area. The proposed development will have a negative impact on the amenity of properties on Exley Lane and Plains Lane though noise, overlooking, overshadowing, loss of daylight, loss of privacy and increased risk of flooding & damage to properties due to the cover / blockage of the natural springs through from Exley Lane to the farm. Planning has been proposed over the area located in the small field adjacent to properties 4 ; 18 Exley Lane however this field has the a culvert which is the underground structure to provide the natural springs with a watercourse, removal of this will increase risk and further damage extent to the flood risk and damage to the environment. Work affecting protected areas and species LP1567 ; area is surrounded by wildlife and protected areas. Planning around this area specifically the field above Plains Lane and Exley Lane will have significant impact on the habitat of the wildlife. Small field adjacent to 4-18 Exley Lane is occupied by deer, wild birds, and bats and many other wildlife, any development around this area would obstruct access to their resting place, damage / destroy breeding resting place Traffic Problems ; Exley

Lane is an access only through road to Halifax with current significant traffic issues and congestion which on occasion requires police presence to manage. Exley Lane does not have the infrastructure to have increased traffic and congestions. No plans have been submitted as part of the development which indicates any improvements or solutions, the proposed will increase the current issues and become a high risk area for vehicle accidents and traffic congestion. Historic rejections ; In 2017 Calderdale Council received over 136 objections to the plans submitted, on review of the revised proposal the initial objections should all stand due to the detail included. The main objections were based around the flooding, Greenbelt, Ecological and Highways Unfortunately the flooding in the Exley lane / Plains Lane/ Park road area was repeated in January 2020 despite flood defences and flood strategies put in place. Again the bridge was damaged and people evacuated from homes in lifeboats. 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Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

In both 2017 and 2020 significant damage has been caused by the flooding which resulted in a strategic plan to be developed. Properties and infrastructure have been damaged on both occasions, both costing Calderdale and residents to rectify.

#### Suggested Modifications:

A review of the area and amount of houses proposed for the area. Following the recent flooding a new external review / impact report on the loss of the Exley fields on the future risk of flooding. A review of the plan area requires to be reduced to remove the wildlife window and non cover over of the natural springs and culvert areas, covering these will ave significant concerns for the residents 4 - 18 Exley lane.

#### Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609752>

Comment ID **HRU1291**

Site ref (if applicable): **LP1567**

Person ID: **1125467**

Name: **Mrs Gemma Hill-Wood**

Organisation:

Agent ID:

Name:

Organisation:

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

#### Legal Compliance Reason:

Failure to plan for community engagement Ensuring that the plan rests on credible evidence base

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

#### Sound Reason:

Site identified on the Calderdale Local Plan as adjacent to Exley Lane North Elland. LP1567 site was previously rejected, objections on the proposed revised plan remain due to the following: The proposed development is not in keeping with the stylistic context or scale of the local area. The proposed development will have a negative impact on the amenity of properties on Exley Lane and Plains Lane though noise, overlooking, overshadowing, loss of daylight, loss of privacy and increased risk of flooding & damage to properties due to the cover / blockage of the natural springs through from Exley Lane to the farm. Planning has been proposed over the area located in the small field adjacent to properties 4 ; 18 Exley Lane however this field has the a culvert which is the underground structure to provide the natural springs with a watercourse, removal of this will increase risk and further damage extent to the flood risk and damage to the environment. Work affecting protected areas and species LP1567 ; area is surrounded by wildlife and protected areas. Planning around this area specifically the field above Plains Lane and Exley Lane will have significant impact on the habitat of the wildlife. Small field adjacent to 4-18 Exley Lane is occupied by deer, wild birds, and bats and many other wildlife, any development around this area would obstruct access to their resting place, damage / destroy breeding resting place Traffic Problems ; Exley Lane is an access only through road to Halifax with current significant traffic issues and congestion which on occasion requires police presence to manage. Exley Lane does not have the infrastructure to have increased traffic and congestions. No plans have been submitted as part of the development which indicates any improvements or solutions, the proposed will increase the current issues and become a high risk area for vehicle accidents and traffic congestion. Historic rejections ; In 2017 Calderdale Council received over 136 objections to the plans submitted, on review of the revised proposal the initial objections should all stand due to the detail included. The main objections were based around the flooding, Greenbelt, Ecological and Highways Unfortunately the flooding in the Exley lane / Plains Lane/ Park road area was repeated in January 2020 despite flood defences and flood strategies put in place. Again the bridge was damaged and people evacuated from homes in lifeboats. Living on Exley Lane we could see the water from the fields develop into streams due to the saturation in the fields, causing the

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Exley Lane does not have the infrastructure to have increased traffic and congestions. No plans have been submitted as part of the development which indicates any improvements or solutions, the proposed will increase the current issues and become a high risk area for vehicle accidents and traffic congestion. Historic rejections ; In 2017 Calderdale Council received over 136 objections to the plans submitted, on review of the revised proposal the initial objections should all stand due to the detail included. The main objections were based around the flooding, Greenbelt, Ecological and Highways Unfortunately the flooding in the Exley lane / Plains Lane/ Park road area was repeated in January 2020 despite flood defences and flood strategies put in place. Again the bridge was damaged and people evacuated from homes in lifeboats. Living on Exley Lane we could see the water from the fields develop into streams due to the saturation in the fields, causing the floods and devastation on park road. The fields above Park road and Plains lane act as a natural flood defence for all the properties in the area. Green belt National planning guidance is that major alternations to Greenbelt boundaries should only take place in exceptional circumstances. Easy access to Greenbelt either taken by of offered to the local council is not considered to be an exceptional circumstance. The local council should firstly look at all other avenues to use, during the council meeting it was confirmed sufficient brownfield sites are available in Calderdale. This area provides an important function for local ecology. Currently this site is broadly ribbon development, mainly agricultural grade 3 land of which there is no better rated in Calderdale. In 2015 the local council objected plans to the extension of the caravan park, this plan contradicts a previous a previous council decision. Employment Land Study The local councils own 2017 Employment Land Review recommended that the site should not be allocated as it performs an important role in safeguarding the countryside from encroachment. This conclusion which is based on Greenbelt guidance in NPPF applies to any proposed housing proposal. Services Access to services is limited and not accessible unless you have transport for both Schools and Drs. Spaces are currently limited in the schools and the development would be the furthest out of the catchment area for the residents, Site identified on the Calderdale Local Plan as adjacent to Exley Lane North Elland. LP1567 site was previously rejected, objections on the proposed revised plan remain due to the following: The proposed development is not in keeping with the stylistic context or scale of the local area. 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Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

In both 2017 and 2020 significant damage has been caused by the flooding which resulted in a strategic plan to be developed. Properties and infrastructure have been damaged on both occasions, both costing Calderdale and residents to rectify.

Suggested Modifications:

A review of the area and amount of houses proposed for the area. Following the recent flooding a new external review / impact report on the loss of the Exley fields on the future risk of flooding. A review of the plan area requires to be reduced to remove the wildlife window and non cover over of the natural springs and culvert areas, covering these will ave significant concerns for the residents 4 - 18 Exley lane.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609753>

Comment ID **HRU1294**

Site ref (if applicable): **LP1567**

Person ID: **1241340**

Name: **Mrs Patricia Jane Steer**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Objection Overview According to Calderdale Councils own methodology under Section 5 ; Identifying Potential Additional Allocations to Provide Sufficient Supply of Land it is listed the land was appraised under the following qualitative factors: The role and character of the area; The need to promote the vitality of the main urban areas; The need to protect the Green Belt; Recognising the intrinsic character of countryside; Conserving and enhancing the natural environment; Having due regard of development impact on SPA/SAC; Reducing pollution; Preferring land of lower environmental value; Utilising previously developed land where it is not of high environmental value and potential development is considered to be viable; Conserving heritage assets; Managing patterns of growth - public transport, walking, cycling - locations which can be made sustainable; Are there particular public benefits - e.g. sport facilities, affordable housing. I believe that this proposal to use the land listed goes directly against the qualitative factors you say Calderdale Council value and feel are important to retain your introduction in this section states the land performs strongly against these factors but add - "when assessing the revised boundary of the specific site, it performs poorly" However there is no definition of how a change of boundary makes it perform poorly and this should be clearly defined. From this statement I would assume that in fact it performs poorly because you are removing all the positives by building on the land. Additionally you have taken no account of the potential impact of the building of 450 homes on this land plus potentially 1041 homes in total over these 5 proposed sites in Elland. My objections cover what I believe a complete lack of understanding of the proposed site, its importance in the area the impact of building on this land and additionally the way this land was previously agreed to be off all proposed Local Plans for 15 years. In breaching this previous agreement with the Elland Greenbelt Preservation Group and limiting the notification that this land was back on the plan to those of interest is at the least misleading but potentially intentionally dishonest I am detailing my objections below . Notification and Methods to Respond All iterations of the Local Plan have had limited direct publication to those who will be most impacted by development of the proposed sites. The main promotion and impact appears to have been to advise via social media such as Facebook or local newspapers. This excludes anyone who does not have access to the internet and / or does not read local press. Additionally, Local Government Facebook pages are not by default the type of site the general population choose to browse. As such most of the objections previously listed under the first phase (136) and now are the direct result of a few people trying to raise this as an important local issue which excludes contacts with many of those impacted by these changes. A specific example is that this plan will impact all those in the areas of Elland, Greetland and Stainland through West Vale and as far as Greetland and Stainland but few will have been aware of potential impact on highways and local infrastructure such as schools and doctors and local highways and by default not had the opportunity to respond to the impact these Local Plan changes may have on their lives. The language of the document also is not in plain English. It uses many terms and abbreviations that are not in common use and should be clarified for example SPA/SAC. By using such language anyone looking to make any objections may miss out on making specific objections due to lack of clarity of the information provided. Misleading Changes to the Local Plan When the original plan was put forward in 2018 it was also of limited publication to those impacted by the proposal. Once identified as an issue and a group was formed the Elland Greenbelt Preservation Group who use Facebook to highlight this issue and it resulted in a protest to the original plan to develop 690 homes on this greenbelt land for many of the same reasons that are laid out below. Residents of Elland gather on Woodlands Road to protest against building on green belt land

People attend a protest on 17 th March 2018 wanting the land taken off the Local Plan and it was agreed that it would be removed for 15 years by Councillor Dan Sutherland in 14 th April 2018. The group had wanted it struck off the plan completely and although this was not the solution that the group wanted it was accepted that the area would now be safe from these proposals. The gathering was documented by: Nick Lavigueur for the Huddersfield Examiner and can be seen at the link below:  
[https://www.examinerlive.co.uk/news/anger-plans-allow-700-homes-14427412?fbclid=IwAR27\\_\\_yEZIDGFKsj\\_9HKrAUBdVUfaC8QQGCPLoywEfpSbA6FgCahTyFTHVw](https://www.examinerlive.co.uk/news/anger-plans-allow-700-homes-14427412?fbclid=IwAR27__yEZIDGFKsj_9HKrAUBdVUfaC8QQGCPLoywEfpSbA6FgCahTyFTHVw) The article states -“Calderdale Council's cabinet member for planning, Cllr Dan Sutherland, has told the Examiner the plot is very unlikely to be used. It was considered as part of Calderdale's Local Plan, its blueprint for development for the next 15 years, but has not been put forward to use.” On 14 th April 2018 Councillor Angie Gallagher asked at a cabinet meeting for clarification on the proposed 1500 new homes designated for the green belt in the Elland constituency. Councillor Dan Sutherland replies that this has now been reduced to 300 within the ward and Park Road has been removed from the Local Plan. This is a matter of cabinet minutes and was available as a video link to the meeting. On 11 th June 2018 Cabinet met and recommended the Local Plan be approved by full Council on 21st June. This included with new housing allocations of 484 dwellings, significantly from the 2472 dwellings proposed last year and the two large sites off Exley Lane to be retained as Green Belt. This information meant the group now understood that the land was back in green belt status and protected for at least 15 years so there was no reason to think that it would be put back into the plan and no reason look for new plans put forward by the council. By agreeing to a specific plan then adding it back in without widespread public notice could be deemed to be misleading and dishonest. Greenbelt ; Protection The proposed site is designated by as green belt and the National Planning Policy Framework (NPPF) of 19 February 2019 sets out the Government recommended planning policies for green belts areas for England (Calderdale) and how these are expected to be applied. This states that green belt land should only be altered in exceptional circumstances. Green belt is defined as having 5 purposes: to prevent the unrestricted growth of large built up areas i.e. urban sprawl 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. In the councils own original evidence it was stated this land performed strongly against the five purposes above and deemed it a -“most sensitive green belt parcel” Hence the council will have to prove exceptional circumstances to alter it and identify clearly as part of this plan or be in breach of NPPF recommendations The NPPF specifically lists under the section Protecting Green Belt Land the following paragraphs regarding what could be considered exceptional circumstances: Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are: (a) buildings for agriculture and forestry; (b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it; (c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; (d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces; (e) limited infilling in villages; (f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and (g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: not have a greater impact on the openness of the Green Belt than the existing development; or not cause substantial harm to the openness of the Green Belt, where the

development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority. As such building on this land would be in breach of NPPF planning regulations.

**Greenbelt ; Air Pollution** The Local Plan does not appear to have any plan in place regarding the drop in air quality arising from this increased traffic and congestion caused when up and potentially more 1250 (540 in this area) new vehicles come into the area once the new housing is built. Because no plans are included for improvements to roads within the proposals so far these vehicles can only add to the constant traffic congestion within the local A and B (and some smaller) roads at peak times. Standing traffic with engines running are known to be amongst the highest creators of air pollution. The increase in population attending schools and the car travel to them from this and other new developments on green belt land further away will increase traffic and pollution from the traffic for any children walking to the schools. The Green Belt also acts as a very important part in helping to maintain the air quality by providing soil trees and open vegetation to process and absorb carbon dioxide and building on the land will reduce this ability to help reduce air pollution. A decline in the air quality also directly affects the biodiversity of the area and will potentially have a substantial impact on flora and fauna in the area.

**Greenbelt ; Wildlife** Use of this proposed land would narrow the green belt around Halifax at this point by approximately 50% reducing the area available for local wildlife to safely move through the area significantly. It would also mean that wildlife in the area would be closer to housing frightening the timid such as deer away from the area but also encouraging foxes to scavenge due to closer proximity of human waste bins. Neither of which would be good for either species. Photographs of Deer and Deer family feeding in LP1567 In the main area proposed between Exley Lane and Plain Lane a wide variety of wildlife has been regularly seen by residents at Valley Mill on Park Road including families of deer feeding, foxes, geese, stoats (or they may have been weasels). The wildlife seen is potentially only a small part of wildlife that uses this area and deems it as a safe place to graze and habit and as such a more intensive analysis of all flora and fauna needs to be undertaken to ensure there are no other protected species before any work should be undertaken. Birds from the local Cromwell Bottom Bird Sanctuary frequently use the land some for hunting and others as rest places while flying. The land also has a right of way along Plains lane and up behind Elland Crematorium and its enjoyment would also be reduced by making this an urban area instead of greenbelt. The Council's own review further states; -"Both West Yorkshire Ecology and the Yorkshire Wildlife Trust are concerned that the proposed allocation abuts Elland Park Wood Local Wildlife Site and any potential adverse impacts. -"

**Greenbelt ; Well-being and Mental Health** One of the current major issues of everyday life is the population's mental health and well being and the presence of green spaces and seeing them has been proven to help in the treatment of mental health. The World Health Organisation is quoted below: -"Green spaces such as parks and sports fields as well as woods and natural meadows, wetlands or other ecosystems, represent a fundamental component of any urban ecosystem. Green urban areas facilitate physical activity and relaxation, and form a refuge from noise. Trees produce oxygen, and help filter out harmful air pollution, including airborne particulate matter. Water spots, from lakes to rivers and fountains, moderate temperatures. Urban parks and gardens play a critical role in cooling cities, and also provide safe routes for walking and cycling for transport purposes as well as sites for physical activity, social interaction and for recreation. Recent estimates show that physical inactivity, linked to poor walkability and lack of access to recreational areas, accounts for 3.3% of global deaths. Green spaces also are important to mental health. Having access to green spaces can reduce health inequalities, improve well-being, and aid in treatment of mental illness. Some analysis suggests that physical activity in a natural environment can help remedy mild depression and reduce physiological stress indicators."

By building on this land it not only changes the local environment but that of the whole village of Elland and those passing on the Elland by pass as can be clearly seen in the photograph below. Once green belt is destroyed by new housing it can not be reclaimed

**Infrastructure ; Overview** Using figures from the Office of National Statistics and Department of Transport I have done a brief and basic analysis of the impact on the local infrastructure that building on this site and the other proposed sites within the Elland section of the plan to highlight specific impacts that the council and not included at any level on their proposed plans. I have used these figures to detail my concerns regarding the impact of both

this specific site and the other Elland sites in the sections below. The figures used are examples but could quite easily be a tip of the iceberg scenario and without a detailed appraisal of the impact on the infrastructure in my opinion this could be deemed to be an unnecessary even careless risk

Site Reference Address Site Area (Ha) Residential Capacity Increase in People based on : Increased in Cars / Vans OoNS UK Households = 2.4 People OoNS Children per household = 0.4 OoNS Children per family =1.89 Dept of Transport =1.2 per household

| Site Reference | Address                                                                                   | Site Area (Ha) | Residential Capacity Increase in People | Increased in Cars / Vans | OoNS UK Households | OoNS Children per household | OoNS Children per family |
|----------------|-------------------------------------------------------------------------------------------|----------------|-----------------------------------------|--------------------------|--------------------|-----------------------------|--------------------------|
| LP0026         | The Gate Farm, Saddleshworth Road, Greetland, Elland, HX48NW                              | 2.23           | 67                                      | 160.8                    | 26.8               | 126.63                      | 80.4                     |
| LP0177         | Land adjacent Ellistones Place, Saddleshworth Road, Greetland, Elland, HX48NW             | 6.65           | 200                                     | 480                      | 80                 | 378                         | 240                      |
| LP0952         | Land at New Gate Farm, Saddleshworth Road, Greetland, Elland                              | 8.8            | 246                                     | 590.4                    | 98.4               | 464.94                      | 295.2                    |
| LP1567         | Land adjacent to Exley Lane, North of Elland, Elland                                      | 15.5           | 450                                     | 1080                     | 180                | 850.5                       | 540                      |
| LP1616         | Land at Ainley Top, South West of the Junction of the A643/New Hey Rd, Ainley Top, Elland | 1.6            | 48                                      | 115.2                    | 19.2               | 90.72                       | 57.6                     |
| LP1625         | Land to the west of, Silverdale Terrace, Greetland, Elland, HX48NQ                        | 1.01           | 30                                      | 72                       | 12                 | 56.7                        | 36                       |
| TOTALS         |                                                                                           | 35.79          | 1041                                    | 2498.4                   | 416.4              | 1967.49                     | 1249.2                   |

Infrastructure ; Doctors There are currently two doctor's surgeries within Elland that are within 1 mile of this site they are Bankfield Surgery and Meadowdale Group Practice. Bankfield has recently had to take on approximately 1000 extra patients following the closure of the local practice of Dr Naseer and is anticipating a further 900 patients when Meadowdale is closed in March 2020. The volume of patients has resulted in extended hours and surgeries held at hubs throughout the area to try to accommodate patients. To accommodate potentially an additional 1080 (based on 2.4 per household) patients will cause serious stresses on an already heavily loaded practice. This could be further loaded by patients from the other proposed Elland sites too with up to 1041 new homes that is an influx of 2798.4 new patients some of which will look to Elland for services. It does not appear that these changes are included in this plan nor is there a risk assessment on the impact on the local NHS Hospitals in Calderdale and Kirklees. This is further impacted when / if Huddersfield Royal Infirmary is closed / rebuilt and could potentially put lives at risk. This part of the road network is unlikely to be seen by potential developers as part of the development but

Infrastructure ; Schools The Office for National Statistics currently assesses each household nationally as 2.4 persons based on the decline in the traditional family group with and increase of single occupancies however these homes would attract a high number of families and while family size is reducing an average family is still 1.89 children per home. If the figures above are used to calculate potential new children from the new households as a base at 0.4 children per household that would be 180 children and at 1.89 per household 850.5 children in need of school places. These figures exclude those of other local proposed sites where numbers for the area increase to 416.4 and 1967.9 children respectively. I am aware that places at local schools are already very limited so this would require planning new or expansion of existing schools and a more detailed understanding of the age groups impacted. A more detailed investigation into potential requirements and timescales would be required breaking down into age ranges to understand types of places required This issue has to be addressed before additional pressure is put on the limited facilities currently available forcing children to have to travel outside of the area for schooling.

Infrastructure ; Highways and Proposed Train Station The Department of Transport Statistics for household car ownership in rural ; urban classification in Yorkshire for 2019 shows an average number of cars / vans per household as 1.2 This figure results in a potential increase from this development of 540 vehicles and if applied to the full Elland area proposals 1249.2 vehicles using road that already get congested on a regular basis. Traffic from the proposed site would potentially have only two exits either via Exley Lane onto Park Road or through Plains Lane again onto Park Road. The Exley Lane through to Siddle is a no through road to traffic. I understand (although this is unconfirmed) this is due to potential subsidence of pipe work. Therefore traffic from the two exits onto Park Road would result in three routes Left to Brighouse: Right and over Elland Bridge into either Elland or West Vale Right and onto the Bypass Both routes -“a” and -“b” mean traffic will flow onto A and B classified roads that already have a significant traffic flow throughout the day including heavy duty articulated lorries. There is a height limitation on the bridge that carries the train line which does reduce some traffic but the flow is steady at all times and includes a significant amount of traffic using Elland Crematorium While the flow is steady through the day at peak times in the morning and evening rush hours both these routes meet congestion delays at the pinch points approaching Brighouse, Elland

approaching Dewsbury Road and in West Vale that would result in more air pollution from standing traffic and increased delays. Route -“c” can flow onto the bypass but again despite extensive regeneration to the road system on Salterhebble the route to the traffic lights is frequently blocked between access off of the slip road and the traffic lights at the junction with the A6026 and B6112 and regularly queues back onto the slip road hence additional congestion that at peak times could even worsen those using route -“b”

Additional traffic into all these routes will be made worse by the additional new traffic generated from the whole Elland proposal. From section 5.2 of the proposal: -“The Highways Agency are concerned about the impact on Junction 24 of the M62. The West Yorkshire Infrastructure Study identifies that further capacity enhancement will be needed 2022 and 2030 to deal with cumulative impact.” Again this is a major pinch point for traffic going onto the motorway and to Huddersfield and the cumulative needs to be extensively reviewed in line with the whole Local Plan proposed by Calderdale Council. Section 5.2 further states - “There are no issues with site access, however, an assessment of slip-road junctions around Halifax Road (A629) and Exley Lane will be required.” As stated above there is no evidence of why no issues with site access are considered. Exley Lane is a quiet B road and the volume of heavy duty equipment required to build 450 new homes needs to be analysed at a deeper level to assure locals living on Exley Lane, Park Road and Plains Lanes no serious infringement of the rights to have peaceful enjoyment of our properties. It should also be noted that the proposal of a new train station and service into from Low Fields will not resolve these problem either. To get to the station will involve a journey through Elland and I suspect if travelling to Halifax a motorist is more likely to choose to drive into Halifax that go approximately the same distance through a congested Elland to park up and await a train. If a new train station is opened in Elland there will be increased traffic on a line that already has seen a substantial increase in traffic over the last 10 years while I have lived in Valley Mill on Park Road. This includes commercial traffic that can take up to two minutes to pass and are so noisy often wake me in the Mill through the night

Infrastructure ; Drainage

There are no assessments of the current updating of drainage for the proposed area and the impact that this potential development would have on the movement of water through these to connect into a new water supply system and for the sewage to be transported away. Any new buildings would obviously bring new pipes but these would be added to the current drainage system in use for the properties in the area. While sections of these pipes may have been replaced over the years it is easy to see the impact of additional use could have from the recent burst in late January 2020 on Dewsbury Road between Elland and Rastrick. The pipe involved I understand carries water from the Baitings Dam to a treatment plant. The section that burst was estimated to be over 60 years and the damaged is assumed to be due to wear and tear. This took approximately 3 weeks to repair and a section of 22 inch main approx 12 foot long was replaced. This caused complete closure of the road for the majority of this time. During this time all redirected traffic caused severe traffic chaos around all of Elland, increased traffic on Park Road, Lower Edge Road and through to West Vale and Siddle. This is not the only recent burst pipe in the area. On 14 th February 2018 there was a similar incident on Burnley road as reported in Halifax Courier. These bursts are due to the age and wear and tear of the current pipes adding additional flow of water and sewage through this system from the volume of new properties proposed could have a serious impact on the pipes that would be of no interest to the developer feeding into these systems. While SuDS is indicated as a possible solution to alleviate surface flooding in the proposed site, it will not resolve the issues of sewerage from the addition of 450 households entering the current system potentially not renewed for 60 plus years in an area rated Flood Zone 2. This is potentially a disastrous with serious implications. SuDS should not be a piecemeal use of a few techniques. A fully integrated system is essential. Some SuDS options could require significant land take so it is essential that they are considered early on in the design process. Any new development would need to address this issue and ensure all pipes are of sufficient quality not just on the redevelopment but also those between it and treatment plants

Flooding ; Overview

A principal cause of flooding is increased urbanisation that means more surfaces of concrete and tarmac which are impermeable. Precipitation cannot infiltrate these surfaces and is channelled into drainage networks and gets to the river very quickly, making it more likely to flood. Also as urban populations increase houses are built on more marginal land including flood plains as is the case for this proposal. The field between Exley

Lane and Plains Lane currently acts as a massive sponge for water and even in this capacity during the floods of 2015 and 2020 created large puddle of run off water that can be seen from in the photographs below from 2020. 2020 Flood Water from the field at the side of Exley Lane close to Plains Lane The floods of December 2015 and February 2020 have been well documented but these mainly show impact on the Upper Calder Valley but we also have an extensive library of the floods on Park Road that included the closure in 2015 of Elland Bridge. The 2020 floods not only devastated many properties on Park Road but also reached as far as entering the garages for Valley Mill Apartments that the proposed development would be behind. The extent of this flooding is unlikely to be lessened by and SuDS implementation because most of this is coming from upstream but if SuDS is implemented with drainage into the canal it could actually add to the potential levels during flooding. Additionally as stated above the land acts like a sponge and for that reason may be unsound for building on. The initial review of the land suggested using SuDS to mitigate the run off allowing the water to run through paving and into the land but as can easily be seen from the photographs the quality of the land would need to be investigated thoroughly as to suitability for building with the potential of slippage and the loss of the way it currently is acting as a natural SuDS The NHBC - "An Introduction to Sustainable Drainage Systems" (SuDS) states; - "The capacity of conventional drainage systems can be a constraint on development. All proposals for development should therefore take account of the effects of potentially increased surface water run-off. This can increase the flow downstream and so increase the risk of flooding, particularly so for greenfield sites" The Government has designates are area as Flood Zone 1 and states under their planning service if the site is over 1 hectare, which this is a full assessment of the site. As such I understand a Sequential Test will be required and believe this should have been done before considering this site for new development. It further states that a Strategic Flood Risk Assessment should be carried out by one or more local planning authorities to assess the risk to an area from flooding from all sources, now and in the future, taking account of the impacts of climate change and to assess the impact that land use changes and development in the area will have on flood risk. In view of recent floods 2015 and 2020 perhaps it would have been prudent to undertake these tests prior to submitting this site into the plan. This is also further stated on the Government pages: - "How should a Strategic Flood Risk Assessment be used in plan making?" And echoed in CMBC Planning Guidance Flood Risk & Drainage - Draft October 2017 They highlight that: Local planning authorities should use the Assessment to: determine the variations in risk from all sources of flooding across their areas, and also the risks to and from surrounding areas in the same flood catchments inform the sustainability appraisal of the Local Plan, so that flood risk is fully taken into account when considering allocation options and in the preparation of plan policies, including policies for flood risk management to ensure that flood risk is not increased; apply the Sequential Test and, where necessary, the Exception Test when determining land use allocations Other Issues The Local plan also states - "the need to demonstrate housing development is achievable with evidence land owners are willing to develop and/or where agents/developers are actively promoting a site" This can be clearly seen that sites rejected have included in their reasons for rejection - "No Developer Interested" This by default implies that all the sites put forward have developers interested in building on the land and this concerns me on the basis that this is seen as a principal to build on green belt land and ignore facts regarding the impacts of infrastructure and that the land should have undergone significant investigations e.g. Sequential Testing before being listed on the Local Plan. This is not about not building new housing in the area but making sure that they are built in the right place with the right infrastructure to allow the people of Elland to be able to have peaceful enjoyment of their properties.

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

Sound Reason:

As stated above the plan has been put forward without due diligence on many issues from the NPPF recommendations on building on greenbelt and flood plains and that this land is also Flood Zone 1 and

before even reaching this part of the process should have had a full assessment of the stability and suitability of the land. No assessment has been made of any required infrastructure.

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

Duty to Co-operate Reason:

No involvement of the local area been successfully implemented. Additionally many who wanted to submit objections have experienced difficulties in objecting on line and frustrated by the lack of robustness in this system

Suggested Modifications:

The council needs to take out the proposal of building on Greenbelt land that is Flood Zone 1 and look for better locations and could consider the use of the many empty mills and mill sites for housing

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609755> ; <http://calderdale-consult.objective.co.uk/file/5635299>

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Comment ID **HRU1303**

Site ref (if applicable): **Lp1567**

Person ID: **1243867**

Name: **Mrs Aimee Pritchard**

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?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Do not build here

Comments:

Additional Evidence Link:

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Comment ID **HRU1308**

Site ref (if applicable): **LP1567**

Person ID: **1243959**

Name: **Mr Steven Hill-wood**

Organisation:



Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The Local Plan does not address the implications of the National Planning Policy Framework, especially, NPPF Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. According to the NPPF Para 143 under 'Proposals affecting the Green Belt' it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' The very special circumstances are non-existent in this site. This development would definitely contribute to future flooding in the area. The revised Calderdale Plan was drawn up between 2016-18 and is no longer fit for purpose. The plan was based on housing requirements that supported the economic growth plan. The plans are not current and not compliant. Economic growth should be called for review. The plans have in no way had any in depth consideration and the impact on the infrastructure, environment and community. The Plans for LP1567 include a field adjacent to houses 4 ; 18 Exley Lane, this field hosts a culvert which requires additional planning, this does not appear to have been requested. The impact of building over this or removing to redirect the water would have a detrimental effect to the water supply for the wildlife in the woods next to the fields which is protected.

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

Sound Reason:

Flooding Flooding impact 2015 & Jan/Feb 2020 ; Park road . Plains lane ; Exley fields are the main source of natural flood defence, removal / building on these will have significant damage and add further devastation to the current issue. Infrastructure Exley lane access only road with no public transport available. Issues from the development of the rugby club have caused significant congestion already, this will be a fundamental issue if the development proceeds going against Government Transport Policy. Local schools are oversubscribed, currently no school within walking distance from Exley Lane. All doctors' surgeries are currently full and one is soon to close again impacting on the two remaining local ones. Wildlife The local wildlife will be decimated by any further development particularly birdlife such as Herons, Kestrels, Kingfishers which are seen very regularly flying around the area. Traffic Congestion Exley lane is a through road only and with only park road and Elland bridge which area already a high risk flood areas the traffic / access would be comprised for all. 5. Ecology Currently the valley enjoys the presence of; herons, squirrels, foxes, deer, badgers and other wildlife, who share the area.

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

Duty to Co-operate Reason:

Following the flooding causing significant damage a full review is required on the impact of building on Exley fields. Photo demonstrates how the fields soaked up a large amount of the water from Feb 2020 rain. Additional planning required for area with culvert Additional report required for wildlife in the areas identified for planning.

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609764>

Comment ID **HRU1310**

Site ref (if applicable): **LP1567**

Person ID: **1128812**

Name: **Miss Frances Walton**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I assume all processes have been followed however as a resident of Plains Lane I haven't received any information about the site being reconsidered for development.

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

Sound Reason:

I do not understand why green belt needs to be built on, there are plenty of other -"brownfield" sites that could be utilised for housing. The governments view on demand for housing is unrealistic, there are plenty of empty houses / houses for sale in the surrounding area. the main concern for the area is flooding, there are already 3 flood drains on this land yet during heavy rain fall the drains are unable to cope. The land is a natural flood plain yet it is still unable to drain away properly. If the land were to be built upon there would be nowhere for the water to drain away - existing drain systems will not be able to cope and I don't believe the addition of further drains will solve the issue. The houses on Plains Lane would certainly flood if this land is developed, we are already stuck if park road floods and unable to leave the street. the land is also utilised by many wildlife species, in particular a variety of birds, deer and foxes. developing the land will deter any kind of animal coming to this area. the main purpose of this land is that it separates the towns, again if it is built on where is the separation of Exley and elland? The roads will not cope with extra traffic, exley Lane is a -"no through road" yet there are many people who use this as a short cut / to cut out traffic on the by pass. the schools and particularly doctors surgery are already over crowded there is. I scope for further footfall.

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

Duty to Co-operate Reason:

I do not believe the consideration of this land has been taken seriously - reassessing drainage is not going to rectify the issue already in hand and adding more traffic to an already heavily congested area.

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609765>

Comment ID **HRU1318**

Site ref (if applicable): **LP1567**

Person ID: **1243953**

Name: **mr alan sullivan**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I strongly object to the plans to build on the green belt land surrounding Exley Lane. This greenbelt does a great job, one of which is to separates Elland from neighbouring towns. There are ample brownfield sites and other areas available that would be better for a building project of this scale This project could add to the risk of future floods, a huge concern for local residents and business's. Traffic and congestion already causes issues but potential addition of this many vehicles would be untenable. The local infrastructure could not sustain an influx of this many individuals and houses. This green belt land provide a habitat for the native wildlife, includingFox's, Rabbits, Bats, Deers, Field Mice and many more.

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

Sound Reason:

I strongly object to the plans to build on the green belt land surrounding Exley Lane. This greenbelt does a great job one of which is to separates Elland from neighbouring towns. There are ample brownfield sites and other areas available that would be better for a building project of this scale This project could add to the risk of future floods, a huge concern for local residents and business's. Traffic and congestion already causes issues but potential addition of this many vehicles would be untenable. The local infrastructure could not sustain an influx of this many individuals and houses. This green belt land provide a habitat for the native wildlife, includingFox's, Rabbits, Bats, Deers, Field Mice and many more

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

Duty to Co-operate Reason:

I strongly object to the plans to build on the green belt land surrounding Exley Lane. This greenbelt does a great job one of which is to separates Elland from neighbouring towns. There are ample brownfield sites and other areas available that would be better for a building project of this scale This project could add to the risk of future floods, a huge concern for local residents and business's. Traffic and congestion already causes issues but potential addition of this many vehicles would be untenable. The local infrastructure could not sustain an influx of this many individuals and houses. This green belt land provide a habitat for the native wildlife, includingFox's, Rabbits, Bats, Deers, Field Mice and many more.

Suggested Modifications:

I strongly object to the plans to build on the green belt land surrounding Exley Lane. This greenbelt does a great job one of which is to separates Elland from neighbouring towns. There are ample brownfield sites and other areas available that would be better for a building project of this scale This project could add to the risk of future floods, a huge concern for local residents and business's. Traffic and congestion already causes issues but potential addition of this many vehicles would be untenable. The local infrastructure could not sustain an influx of this many individuals and houses. This green belt land provide a habitat for the native wildlife, includingFox's, Rabbits, Bats, Deers, Field Mice and many more

Comments:

Additional Evidence Link:

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Comment ID **HRU1342**

Site ref (if applicable): **LP1567**

Person ID: **1243945**

Name: **Miss Jody Littleley**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Calderdale Council have not made the residents aware of the need to submit new objections to the updated Local Plan and the timescales for this. This is very underhand and unfair.

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

Sound Reason:

The Green Belt land should be preserved at all costs and should not be built on unless there are exceptional circumstances. Calderdale Council have not provided any evidence of exceptional circumstances. They say they want to build affordable housing - there are plenty of empty houses across Calderdale (how about these are filled first before thinking about building anymore), they are also plenty of non green belt sites that can be built on so build on those! The CPRE state "The development of brown fields sites should be a priority; there are more than enough brown field sites to fulfil the requirement without having to encroach onto Green Belt". This is not sustainable - there is not enough infrastructure to support the existing residents. Doctors surgeries, schools, dentists etc. are all full to capacity. The roads are incredibly busy - the traffic on Park Road, Elland Bridge, Elland bypass, and West Vale is atrocious especially at peak times. The roads simply cannot cope with anymore cars. When Elland Bridge has closed due to damage from the floods it had a massive detrimental effect on traffic and commuters. The roads turned into car parks. I'd urge you to travel on these roads at peak times to understand how bad the situation is now and think about how an extra 900 cars would create a huge negative impact on this. This site in the existing Green Belt should be removed from the Plan as the exceptional circumstances for its release do not exist. Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: (i) to check the unrestricted sprawl of large built-up areas (ii) to prevent neighbouring towns merging into one another (iii) to assist in safeguarding the countryside from encroachment (iv) to preserve the setting and special character of historic towns (v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. It does not conform to Central Government Policy; it does not conform with current legislation with regard to building on flood risk areas. If you build on the Green Belt you are endangering lives by taking away the much needed natural flood defence which soaks up a lot of rain water. If this land is built on it will have a catastrophic impact on the flooding that already exists. On the 9th of February Elland Bridge closed as it needed to be structurally assessed due to flooding, Park Road was underwater and closed due to flooding, people had to be rescued by boat, the fire service had to attend, houses on Plains Lane flooded. If you build on the Green Belt you are endangering people's lives, you can't mitigate that. A poor woman in Wales lost her life due to the floods, it seems like Calderdale Council are not concerned about the welfare of the residents and are quite happy to endanger their lives if it means they get money from developers. If you take away the Green Belt you will take away the habitat of the wildlife. Where are they supposed to go? The Green Belt is supposed to help protect our wildlife and sustain our ecosystem. The proposed development of the Green Belt will increase the noise and air pollution levels. Calderdale Council recognises that climate change is a huge issue but are actively wanting to add to the problem. This development will be an eyesore on the land. Park Wood Crematorium overlooks the site, which is currently rather peaceful. If you build 450 houses there it will create a lot of unwelcome noise and you will lose the much needed serenity. This could result in loss of business as families decide to have funeral services at quieter sites with more attractive views. Archaeological Site PRN10978 and PRN3995 are of historical significance and should be protected by the Council, not destroyed and built upon. Where is the evidence from Calderdale Council to prove that this plan is justified?

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

Duty to Co-operate Reason:

See above reasons.

Suggested Modifications:

Dismiss the plan. It needs to be thrown out. People's lives are at risk if the land is built upon.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609772>

Comment ID **HRU1435**

Site ref (if applicable): **LP1567**

Person ID: **1243973**

Name: **Mrs Amy Hannah**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

All points below should be considered to apply to sites LP0026, LP0177, LP0952 and LP1625 and therefore these sites should equally be rejected from the Local plan. I would like to point out that plans LP0026 (The Gate Farm), LP0177 (Land adjacent Ellistones Place), LP0952 (Land at New Gate Farm) and LP1625 (Land to the west of Silverdale Terrace) should be considered as one and these are not separate proposals as they are so interrelated (sited within a small 1 km area along Saddleworth Road) that they can only be assessed fairly if considered as a whole. By splitting them out as separate plans the full picture is being concealed. The Local Plan does not address the implications of the National Planning Policy Framework, especially, NPPF Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. According to the NPPF Para 143 under 'Proposals affecting the Green Belt' it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' The very special circumstances do not apply. Other reasons not legally compliant. Poorly advertised and believe that residents of Greetland have not been made aware of the proposal and given opportunity to comment.

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

Sound Reason:

My main points of objection are as follows: Flooding issue This affects the whole area and is relevant to all sites in question. The land put forward is unsustainable. Further development will result in additional surface run off. This in turn will contribute to further flooding. The fields considered for development currently act as a natural flood defence and even without the further development they are unable to cope with absorbing heavy rainfall. We have seen the effect of this in recent weeks and it has resulted in severe flooding in the area, flooding of Black Brook at the bottom of these fields and into West Vale. In 2015, the Boxing day Floods demonstrated this at its worst. Clearly, building more houses on these fields will cause major issue contributing to further more serious flooding. Calderdale council therefore have a duty of care to comply with current policy and legislation on flooding and they should remove these fields from the Local Plan. Para 155 of the NPPF states that 'Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas of highest risk (whether existing or future). Where

development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere ' Effect on Greenbelt Land The NPPF at a para 133 states that -“ The Government attaches great importance to Green Belts ”and at para 136 that -“Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified”At para 144 it further states -“ local planning authorities should ensure that substantial weight is given to any harm to the green belt”and at para 145 -“ a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt ”Building on these sites is contradictory to all of these statements. If considering all of the sites as one as we should be doing, the development would mean a large and disproportionate amount of land and open space would be lost from this small community. This also includes the loss of public amenity, wildlife habitats (foxes, badgers, bats, rabbits, deer, birds of prey), loss of green space, loss of wildlife corridor, loss of public footpaths and the creation of urban sprawl. I believe such loss associated with Greenbelt will contribute to affecting our community's wellbeing and mental health in a negative way. The Greenbelt is free for the community to use and greatly benefits the vast majority of residents who utilise this on a daily basis. The land is a quiet, safe and therapeutic environment and is the centre of our community. To lose all this would be devastating. Increased air pollution The proposed plans would obviously create more air pollution due to more houses, more people and more cars. The single biggest air polluter is traffic, or road vehicles. More people die of air pollution than Malaria and HIV, this should be a consideration when looking at these proposed plans to develop on such disproportionate scales. The Clean Air Strategy 2018 states that - While we need to ensure economic growth, we also need to realise the 'cost of air pollution on health'. Infrastructure The increase in houses at this capacity will add a huge pressure to already full schools in the area. The schools are not big enough to cope with this amount of new housing. The doctor's surgery is also full and already struggles to cope with the number of patients and appointment requests. The NHS dentists have long waiting lists without further increase to residents. There is one main road which runs through the proposed area which would not be sustainable for such an increase in traffic as a result of the development. The existing sewage system and drainage cannot cope with the current volume and with the rain water seen in recent times and in past years has caused the raw sewage to overflow into the footpaths and fields in the area. This problem would only increase with further development. Traffic congestion and noise pollution Greetland and West Vale already suffer chronic traffic congestion, The village is already at breaking point at peak times and the roads cannot cope with the existing volume of traffic, let alone adding to that with these proposed developments. At school drop off times Saddleworth Road becomes a single lane road due to the parked cars on both sides.It becomes an obstacle course to get through and the large lorries that frequent the area make it dangerous for road users and pedestrians. I fear for the lives of the children trying to get to school daily..

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

Duty to Co-operate Reason:

Suggested Modifications:

Do not build any of the proposed housing in the Local Plan on our greenbelt land.

Comments:

Additional Evidence Link:

Comment ID **HRU1464**

Site ref (if applicable):

Person ID: **1242986**

Name: **Mrs Atkinson Clayton**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I live in the Valley Mill Apartments and i have had no contact about the proposed development, if this has been put around Siddal and Exley then this is not compliant to everyone as the road up to Siddal is for access only and we do not have that access.

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

Sound Reason:

I strongly object to the proposal of building 450 dwellings for the following reasons. The bypass from Ainley top to Halifax cannot cope with any more traffic! I travel to Halifax every day to work in Skipton, I start my journey at 7:30 from park road and join the by-pass by using the slip road just passed Elland Bridge, I que getting onto the by-pass and I can be queuing for up to 12 minutes until I reach the traffic lights at the junction to West Vale/Sowerby Bridge etc, once passed the traffic lights I am in yet another que going up Salterhebble even though the road has been widened! Not only am I queuing going up Salterhebble there is queuing on the opposite side also. The AQMA around this area is already on the councils AQMA report and is being monitored so with added traffic from 450 extra housing this will only make the Air Quality worse. 2. The road leading up to Siddal is for access only, it is already being used as a rat run to try and avoid the queues (both ways) on the bypass, again if this proposed building of 450 houses goes ahead the road through Siddal will be impassable. 3. park road going towards Brighouse passed the crematorium is already congested with parked cars on either side which makes it extremely difficult to pass. 4. Has any consideration been taken towards Park Wood Crematorium? This is a beautiful place and as such should be considered, the extra traffic on these roads, the queues in and out of Halifax will have an effect, causing unnecessary stress. If the move goes ahead to have only one A&E serving Halifax and Huddersfield this development would have an enormous impact on the journey time especially in peak times this could have catastrophic consequences! FLOODING :.The fields flood regularly in heavy rainfall (evidence is attached) even with the introduction of new drainage systems which still seem unable to cope when the storm drains are overwhelmed. Park Road has been the subject of severely flooded with the 2015 Boxing day floods and more recently storm CIARA on Feb 9th 2020 in which Park Road residents were totally cut off and unable to get out of Plains Lane onto Park Road .LP1567 falls within the indicative critical drainage area data provided by CMBC .How can the use of hard landscaping (preventing the field acting as a natural sponge) help to cure the current inadequate drainage system we are having to deal with. The land Photographic evidence provided shows how natural water streams form from the top of the hill and collect at the bottom where the fields take most of the water, This would end up on Park Road, which could lead to loss of life. Before i lived in Valley Mill i lived at Claremount Road opposite the Titan building (which is now being developed) i lived there for 50 years and i have never seen any flooding on Claremount Road or Carmel Road which is adjacent to Claremount Road. This year Claremount Road and Carmel road flooded, i can categorically say the reason is because of the large development of houses on the Titan site and also on some of the greenbelt area behind the brown site. This is overwhelming evidence that covering the area with concrete stops the natural barrier to flooding. I URGE YOU NOT TO BUILD ON THIS SITE IT WILL BE DETRIMENTAL TO THE WHOLE AREA!

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

Duty to Co-operate Reason:

This is the only green belt between Halifax and Elland which will stop the spread of urban sprawl and make Elland a suburb of Halifax. As you are no doubt aware green belt can only be built on in exceptional

circumstances, being the fact that there is adequate brownfield sites available to build these house on and would give local small building firmsthe chance to keep the money in the local area. I also know that building more houses is not going to help the shortage of housing! it will only give landlords more choice of purchasing these homes to rent out, which again will cause an housing shortage and will not enable people to get on the housing ladder. This has been proven in the Claremount area of Halifax, where affordable housing has been built only to be bought by landlords to add to their portfolio.

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609800> ; <http://calderdale-consult.objective.co.uk/file/5609799> ; <http://calderdale-consult.objective.co.uk/file/5609798>

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Comment ID **HRU1499**

Site ref (if applicable): **LP1567**

Person ID: **1182814** Name: **Miss Jean Harding** 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?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1501**

Site ref (if applicable): **LP1567**

Person ID: **1182814** Name: **Miss Jean Harding** 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:

Why on earth does Elland need houses built on this site. Its going to cause more floodings, the millions spent already on flooding hasnt worked has it, look what hapoened recently. Instead of thinking of your own pockets, start thinking of the residents and business owners, they have suffered enough. You should never have built on Low Fields. More houses, more people. Its already hard to get a Doctors appointment. More stress on the schools, employment etc. Elland is only a small Town and we can do without this site being built on. J Lynne Harding lynnehard58@hotmail.co.uk

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1540**

Site ref (if applicable): **LP1567**

Person ID: **1244113**

Name: **Mrs Lynn Harris**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I strongly object to this building of houses because of flooding. The fields soak up a lot of the water which already runs down to the below houses, building is just going to course more flooding down Plains Lane and Park Road. We don't need this adding to what we already experience.

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

Sound Reason:

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1585**

Site ref (if applicable): **LP1567**

Person ID: **1243966**      Name: **mrs P.palmer palmer**      Organisation:

Agent ID:      Name:      Organisation:

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

Legal Compliance Reason:

The LP completely disregards NPPF Section 13 Protecting Green Belt Land Paragraph 80

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

Sound Reason:

Flooding Flooding impact 2017 & Jan/Feb 2020 ; Park road. Plains lane ; Exley fields are the main source of natural flood defence, removal / building on these will have significant damage and add further devastation to the current issue. Increased housing to the fields would have a non reversible impact on the areas of Park road / Plains lane Infrastructure Exley lane access only road with no public transport available. Issues from the development of the rugby club have caused significant congestion already, this will be a fundamental issue if the development proceeds going against Government Transport Policy. A high level of non access traffic already causes high risk for residents. Local schools are oversubscribed, currently no school within walking distance from Exley Lane. All doctors' surgeries are currently full and one is soon to close again impacting on the two remaining local ones. Wildlife The local wildlife will be decimated by any further development particularly birdlife such as Herons, Kestrels, Kingfishers which are seen very regularly flying around the area. A family of deer's also habitat within the fields, these can be seen on a regular basis around the area. Traffic Congestion Exley lane is a through road only and with only park road and Elland bridge which area already a high risk flood areas the traffic / access would be comprised for all. Areas identified in the plan also have natural springs and culverts which act as a current flood defence for the properties and also fresh water for the wildlife and farm. I believe that the additional planning is required in these circumstances.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1593**

Site ref (if applicable): **LP1567**

Person ID: **1244132**      Name: **Mrs Helen Roberts**      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 wish to strongly object to the Local Plan including the land of Exley lane, Plains Lane, Park Road and Woodman Road for the following reasons:- Flooding and drainage issues Although the site is located in Flood Zone 1, it is widely known locally that the area to the east of the site (Plains Lane, Park Road, Woodman Road) has flooded on a number of occasions - most recently 2015 and a fortnight ago February 2020. In 2015 a lot of houses and businesses on Park Road and Plains Lane were severely flooded and the bridge had to be rebuilt. This work took a year and I believe cost 5 million. This time again a number of homes and businesses were affected - it was on the national and local news that a young Mother and her babies had to be rescued by the fire brigade. Development of the site could potentially cause further hydrological changes to occur, making the situation worse. This constraint is recognised by the Council as over half the site is provisionally designated as a 'critical drainage area'. Draft Policy CC2 states that -“prospective developers required to submit a site-specific Flood Risk Assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. In Critical Drainage Areas, a site-specific Flood Risk Assessment should also demonstrate that new development is not at risk from flooding from existing drainage systems or potential overflow routes” it is the view of local residents who have lived all their life in the area that drainage would be a -“show stopper” for new development on this site, and would only make an already critical situation much worse. Could I respectfully ask the Inspector if the Fire Brigade, Police and Highways are contacted to give their input on developing the site given the recent flooding. Historical information Plains Lane was originally an access road to Park Nook mine before any housing was built in the area. Nowadays the road stops short of the mine but there is still a brick paved track that continues up the hill side and past the mine. Park Nook was a clay mine for Wilkinson's brick works and the whole of the hillside is riddled with these mines. Impact on local business/environmental health concerns. There are a number of businesses located directly adjacent to the south-eastern end of the site: Colson Industries Ltd is one and they operate 24 hours a day. A B2 manufacturing premises operating 24 hours a day is by definition a -“bad neighbour” use.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1622**

Site ref (if applicable): **Lp1567**

Person ID: **958862**

Name: **Mr Andrew Shaw**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

This site is designated green belt with no exceptional circumstances for release.

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

Sound Reason:

**GREENBELT** This area of greenbelt land prevents urban sprawl (NPPF 134a) between Elland in the south and Halifax in the north. With the river Calder, canal and A629 to the south this area of land provides a natural break and important green space(134c) from Halifax in the north. There would be a huge detrimental effect on our local wildlife which includes foxes deer geese herons woodpeckers bats hedgehogs etc . We need to retain green spaces for our health and wellbeing. The development of this land would be totally against the five green belt purposes of the NPPF. **POLLUTION** The Governments and CMBC air quality report states air pollution is associated with adverse health impacts heart disease cancer and lung diseases. It states the benefits LARGE RURAL AREAS next to major roads have on air quality. Yet they are now considering building an extra 450 homes ((900 cars) on land that borders the major A629. They have already said the new layout for the A629 may have a detrimental effect on air quality. Calderdale has above average lung related illnesses already. To add to this they are proposing to add an extra 900 cars to Exley lane which is a narrow twisty lane already congested at peak times and a danger with speeding cars and illegal rat run usage. As an asthma sufferer myself i have great concerns as this greenbelt land helps to disperse and absorb some of these poisonous fumes. To add to this gas storage tanks and yet another industrial unit is proposed to be built just below which will increase the volume of pollution. I only have to walk into Elland and can smell all the fumes. We find it hard to believe that we have only one accident and emergency in the area and yet the proposed railway station at a cost of Â£20m will mean we have 5 stations within 3 miles I. **FLOOD RISK** In view of the recent flooding in the last 5 years in Elland current policy on flooding states 'due to recent wide scale flooding incidents in the country and the increasing threat of climate change , new development in flood risk areas would only be allowed when it is exceptionally necessary and when it does not increase the risk of flooding in the developments community or elsewhere'. Only this morning on Andrew Marr show George Eustice the new environment secretary stated that there is no capacity in land and rivers to hold water in flood risk areas and he went on to say that the current NPPF is unfit for purpose and will be reviewed in late spring 2020. This questions the viability and legality of CMBC long term plan. Most of this area of land (90%) is classified as indicative drainage area by CMBC. In these periods of heavy rain Exley Lane was like a river flowing down the road taking large stones and removing the road surface how much worse would this be if the fields weren't there to act as a sponge and soak up the surface water. **INFRASTRUCTURE** Exley Lane is a narrow twisty lane totally unsuitable for the increased number of cars that 450 houses would bring (900 cars at least twice a day) There is only one footpath and I have to listen for traffic coming round the bend and run across to other side of the road. Our wall and the bend opposite have been crashed into several times and there have been numerous bumps. There are not enough schools ,doctors surgeries, dentists and only one accident and emergency. This is insufficient at present and certainly will be totally inadequate for the projected increases. We are absolutely astonished that this land has been re- included to the list of sites to be considered especially in view of recent floods and the fact it meets the NPPF when assessed against the five purposes of the green belt. For over forty years CMBC have refused the owner permission to build on this land for all the right reasons ( drainage wildlife highways etc) At a previous meeting the council planners assured us there are enough brownfield sites to accommodate the local plan without the need to use valuable greenbelt. The topography of Calder Valley is such that it is always going to be prone to flooding. George Eustice has said we need more nature based solutions surely keeping open green belt as a soak away is nature based and helps to prevent flooding in the valley. The targets that Calderdale are working with were set before we came out of the EU and as such is there is no need for such a high volume of housing? Please remove this site from the local plan and let it remain Green Belt for future generations.

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

Duty to Co-operate Reason:

There are no justifiable exceptional circumstances for change of use of this Green Belt land and it does not comply with NPPF current policy .

Suggested Modifications:

In light of the recent flooding the local plan should be revised when the new NPPF becomes available in the spring.

Comments:

Additional Evidence Link:

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Comment ID **HRU1646**

Site ref (if applicable): **LP1567**

Person ID: **1244117**

Name: **Mrs Linda Littley**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

See reasons below

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

Sound Reason:

see reasons below

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

Duty to Co-operate Reason:

The Green Belt land should be preserved at all costs and should not be built on unless there are exceptional circumstances. Calderdale Council have not provided any evidence of exceptional circumstances. They say they want to build affordable housing - there are plenty of empty houses across Calderdale (how about these are filled first before thinking about building anymore), they are also plenty of non green belt sites that can be built on so build on those! The CPRE state "The development of brown fields sites should be a priority; there are more than enough brown field sites to fulfil the requirement without having to encroach onto Green Belt". This is not sustainable - there is not enough infrastructure to support the existing residents. Doctors surgeries, schools, dentists etc. are all full to capacity. The roads are incredibly busy - the traffic on Park Road, Elland Bridge, Elland bypass, and West Vale is atrocious especially at peak times. The roads simply cannot cope with anymore cars. When Elland Bridge has closed due to damage from the floods it had a massive detrimental effect on traffic and commuters. The roads turned into car parks. I'd urge you to travel on these roads at peak times to understand how bad the situation is now and think about how an extra 900 cars would create a huge negative impact on this. This site in the existing Green Belt should be removed from the Plan as the exceptional circumstances for its release do not exist. Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: (i) to check the unrestricted sprawl of large built-up areas (ii) to prevent neighbouring towns merging into one another (iii) to assist in safeguarding the countryside from encroachment (iv) to preserve the setting and special character of historic towns (v) to assist in urban regeneration, by encouraging the recycling of derelict and

other urban land. It does not conform to Central Government Policy; it does not conform with current legislation with regard to building on flood risk areas. If you build on the Green Belt you are endangering lives by taking away the much needed natural flood defence which soaks up a lot of rain water. If this land is built on it will have a catastrophic impact on the flooding that already exists. On the 9th of February Elland Bridge closed as it needed to be structurally assessed due to flooding, Park Road was underwater and closed due to flooding, people had to be rescued by boat, the fire service had to attend, houses on Plains Lane flooded. If you build on the Green Belt you are endangering people's lives, you can't mitigate that. A poor woman in Wales lost her life due to the floods, it seems like Calderdale Council are not concerned about the welfare of the residents and are quite happy to endanger their lives if it means they get money from developers. If you take away the Green Belt you will take away the habitat of the wildlife. Where are they supposed to go? The Green Belt is supposed to help protect our wildlife and sustain our ecosystem. The proposed development of the Green Belt will increase the noise and air pollution levels. Calderdale Council recognises that climate change is a huge issue but are actively wanting to add to the problem. This development will be an eyesore on the land. Park Wood Crematorium overlooks the site, which is currently rather peaceful. If you build 450 houses there it will create a lot of unwelcome noise and you will lose the much needed serenity. This could result in loss of business as families decide to have funeral services at quieter sites with more attractive views. Archaeological Site PRN10978 and PRN3995 are of historical significance and should be protected by the Council, not destroyed and built upon. Where is the evidence from Calderdale Council to prove that this plan is justified?

Suggested Modifications:

This is Green Belt and should be left as such in this very flood sensitive area...plans should not go ahead

Comments:

Additional Evidence Link:

Comment ID **HRU1654**

Site ref (if applicable): **LP1567**

Person ID: **1242828**

Name: **Mr Charles Littley**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

See reasons below

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

Sound Reason:

See reasons below

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

Duty to Co-operate Reason:

The Green Belt land should be preserved at all costs and should not be built on unless there are exceptional circumstances. Calderdale Council have not provided any evidence of exceptional circumstances. They say they want to build affordable housing - there are plenty of empty houses across

Calderdale (how about these are filled first before thinking about building anymore), they are also plenty of non green belt sites that can be built on so build on those! The CPRE state "The development of brown fields sites should be a priority; there are more than enough brown field sites to fulfil the requirement without having to encroach onto Green Belt". This is not sustainable - there is not enough infrastructure to support the existing residents. Doctors surgeries, schools, dentists etc. are all full to capacity. The roads are incredibly busy - the traffic on Park Road, Elland Bridge, Elland bypass, and West Vale is atrocious especially at peak times. The roads simply cannot cope with anymore cars. When Elland Bridge has closed due to damage from the floods it had a massive detrimental effect on traffic and commuters. The roads turned into car parks. I'd urge you to travel on these roads at peak times to understand how bad the situation is now and think about how an extra 900 cars would create a huge negative impact on this. This site in the existing Green Belt should be removed from the Plan as the exceptional circumstances for its release do not exist. Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: (i) to check the unrestricted sprawl of large built-up areas (ii) to prevent neighbouring towns merging into one another (iii) to assist in safeguarding the countryside from encroachment (iv) to preserve the setting and special character of historic towns (v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. It does not conform to Central Government Policy; it does not conform with current legislation with regard to building on flood risk areas. If you build on the Green Belt you are endangering lives by taking away the much needed natural flood defence which soaks up a lot of rain water. If this land is built on it will have a catastrophic impact on the flooding that already exists. On the 9th of February Elland Bridge closed as it needed to be structurally assessed due to flooding, Park Road was underwater and closed due to flooding, people had to be rescued by boat, the fire service had to attend, houses on Plains Lane flooded. If you build on the Green Belt you are endangering people's lives, you can't mitigate that. A poor woman in Wales lost her life due to the floods, it seems like Calderdale Council are not concerned about the welfare of the residents and are quite happy to endanger their lives if it means they get money from developers. If you take away the Green Belt you will take away the habitat of the wildlife. Where are they supposed to go? The Green Belt is supposed to help protect our wildlife and sustain our ecosystem. The proposed development of the Green Belt will increase the noise and air pollution levels. Calderdale Council recognises that climate change is a huge issue but are actively wanting to add to the problem. This development will be an eyesore on the land. Park Wood Crematorium overlooks the site, which is currently rather peaceful. If you build 450 houses there it will create a lot of unwelcome noise and you will lose the much needed serenity. This could result in loss of business as families decide to have funeral services at quieter sites with more attractive views. Archaeological Site PRN10978 and PRN3995 are of historical significance and should be protected by the Council, not destroyed and built upon. Where is the evidence from Calderdale Council to prove that this plan is justified?

#### Suggested Modifications:

LP567 should be scrapped

#### Comments:

#### Additional Evidence Link:

Comment ID

**HRU1655**

Site ref (if applicable): **LP1567**

Person ID: **1243605**

Name: **Mr James Roberts**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Not legally compliant as the residents and businesses , which will be adversely effected by the subsequent increased flooding , have not been adequately consulted on the issues.

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

Sound Reason:

The plan is not sound mainly due to the frequency of flooding that is already occurring on Plains Lane , which then feeds into Park Road and closes that access to Brighthouse along with making the houses and businesses uninhabitable. The water already runs off the fields so the situation will be exasperated by building houses on land which is used as a soak away . The land in question already had land drains installed about 35 years ago by the farmer so he was able to use the land to grow crops etc Once any contractor arrives on site and digs the foundations all this drainage will be destroyed making the fields a complete bog.I am sure any house developer will not include a budget of Â£1m to replace all these current drainage pipes .It would be a sheer lunatic who passes any plan which will increase the flooding issue in Calderdale , especially after what damage has been witnessed/caused over the last three weeks. Furthermore , there are plenty of brownfield sites available in Calderdale , before anyone has to consider using the Greenfield ones.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1675**

Site ref (if applicable): **LP1567**

Person ID: **1244180**

Name: **Mrs Lynn Rowley**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I am a resident of Valley Mills and have received no notice regarding this. This is green belt land and permission has previously been refused. I would have therefore expected the views of the local neighbourhood to have been sought.

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

Sound Reason:

FLOODING This area has flooded badly in the last few years, including the recent floods in February. The water pools on the hill, before running down into Plains Lane and then flooding Park Road. Combined with



the canal and river at the other side of Park Road bursting their banks, it made the area a complete no go. The garage under Valley Mills where the cars are parked was waist deep and we could not get our cars out. We were completely isolated in our homes until the water levels dropped. The drains were just overflowing, firemen were wading through the water which was waist deep. And this is without another 450 houses being built on the green belt land which at present, soaks up some of the excess water. Where on earth will all that water go once a large area of concrete is there? Yes....down to us poor residents at the bottom of the hill on Woodlands Road, Park road and Plains Lane! TRAFFIC/INFRASTRUCTURE Park Road is one of the busiest roads in Elland...probably THE busiest. It already cannot cope with peak hour traffic, so imagine the traffic and pollution if another 5/600 cars are using it, as many households have 2 cars nowadays. It is already almost impossible to turn right out of either Park Road, or turn right onto Exley from the from the bypass. I have had 2 cars killed on that road in the past 3 years and yes...they may only be cats, but it's a matter of time before it's a child or adult. the local Doctor's is already oversubscribed, as well as schools bursting to capacity. Where are all these new residents supposed to go? Are you building more schools, Doctors surgeries to account for these? No...of course not. WILDLIFE The area that we are talking about is abundant with wildlife. Deer, rabbits, foxes are often seen running in the field. it is also a stop off point each year for migrating geese. Where are all these animals going to go now?

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5610301>

Comment ID **HRU1824**

Site ref (if applicable): **lp1567**

Person ID: **1246059**

Name: **Julie Gibson**

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:

My husband and I own Advance Engineering (HX) Ltd on Park Road for 18 years and in the past 5 years we have suffered issues due to flooding in our car park and on the road stopping us having access due to water levels. This never happened before Calderdale Council made changes towards Hebden Bridge and Mytholmroyd after 2012 flood along with extensive building of industrial units and houses. I urge you to reconsider this planning application I saw first hand water running from the hill side into Park Road 2 weeks ago when the residents flooded again. This will only impact on the serious ongoing worry we all have. Also the crematorium is on Park Road when it floods this can have a knock on effect to undertakers and families which surely should be considered also I fully understand new houses are needed however

we have to look at the environmental impact and at some point areas have to be considered as full. No further large building of estates or units. Traffic is also very busy in this area. I have complained endlessly to Calderdale re wagons not fitting under the railway bridge by our business so have others yet nothing is done. The signage is not clear enough at the roundabout in Elland and we are then asked to help them almost daily turn round. This has a financial implication on us breaking off work and deliveries or customers not having access to our car park due to traffic. If 450 houses are coming that is potentially a further 900 plus cars also using this road or Elland bypass which is always queued up at peak times, this equally impacts on our emergency services. We have lost 2 GP surgeries my husband & I also live in Elland our son went to school in a Elland too. The town is struggling for GPs as it is along with school places. I have absolutely nothing positive to say about this development and I hope it is once again rejected on the grounds of common sense.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1826** Site ref (if applicable):

Person ID: **952666** Name: **Mrs Jill Walker** 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:

Comments:

Additional Evidence Link:

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Comment ID **HRU1827** Site ref (if applicable): **lp1567**

Person ID: **952595**

Name: **Mr Ian Walker**

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:

LP1567 I am opposed to the removal of Green Belt status in the area adjacent to Exley Lane, Elland for the following reasons: Flooding. The Calderdale Local Plan is fundamentally unsound with regard to the impact of flooding and should be revisited before any alteration to Green Belt - in particular on the Elland/Calder Flood Plain - be considered. The Planning Inspectorate's latest procedural guide for Local Plan Examinations, (June 2019, 5 th edition), indicates that evidence based documents need to be sufficiently up-to-date, with key documents impacting on development completed within the last 2 years. However, although the submission date for the Local Plan was 11 th January 2019, the Flood Risk evidence and Flood Maps date back to 2016, utilising information from the 'Calder 2015 study modelled flood outlines', which does not take into account the devastating impact of borough-wide flooding from either the Boxing Day 2015 floods, Storm Ciara flooding in February 2020 and indeed Storm Dennis 1 week later, or the more localised flooding events in between. The Local plan evidence for Critical Drainage Areas dates back even further to 2014. The areas surrounding Park Road in Elland have been flooded on numerous occasions, causing homes and businesses to flood, and regular road closures between Brighouse and Elland. The National Planning Policy Framework sets strict tests to protect people and property from flooding which all local planning authorities are expected to follow. As the Strategic Flood Risk Assessment evidence base is not up to date, it is clear that the flood risk associated with the addition of site LP1567 and others is not fully understood, particularly as this is likely to increase flood risk elsewhere. The flood risk to Park Road and surrounding areas of Elland has been acknowledged, however whilst some areas such as Mytholmroyd have benefitted from significant investment in flood defences, the proposed flood defence work in Elland was removed from the Flood Risk Reduction Scheme FRSS1 as the capital investment was considered too high for the number of properties that would be protected. As such the required flood infrastructure improvements required in Elland are not in place and there are currently no mitigation measures proposed within the Infrastructure Delivery Plan which is unsound. It is clear that the submitted flood documents have been overtaken by events and cannot be relied upon, which is a huge concern given that there have been three major flooding incidents in less than 10 years in Calderdale, all affecting Elland, which obviously differs from the flooding information submitted as part of the Local Plan evidence base. This is highlighted further as the Council leader Tim Swift indicated that flooding is likely to become a regular occurrence in Calderdale and requested the Government to step in. A further point to note is that flood prevention measures upstream from Elland e.g. Mytholmroyd, will and have as expected simply moved the flooding problem further down the Calder Valley; Storm Ciara and Storm Dennis both caused flooding on a scale worse than that of Boxing Day 2015. Wild life LP1567 is a wildlife corridor for many species of animal e.g. deer, fox, many migrating birds. This will be destroyed by housing to this scale. Infrastructure Elland is physically unable to cope with any extra traffic load at peak periods. In the event of the proposed housing development, an estimated 1000 extra vehicles would enter and Park Road every day. Elland town centre and the route to the M62 would become grid-locked; Elland by-pass is already grid-locked. 1000 extra vehicles would block the carriageway to a standstill. Schools shops and Doctor's surgeries are also needed as part of a development of this size; there is NO provision for this. I conclude that LP1567 is unsuitable for housing.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU2020**

Site ref (if applicable):

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?:

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION Landowner is only interested in selling the north eastern half of the allocation for housing. The remainder (south of the railway) will continue as a caravan park. Allocation capacity should be reduced to 220.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5632539>

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Comment ID **HRU2041**

Site ref (if applicable):

Person ID: **1185901**

Name: **Avant Homes**

Organisation:

Agent ID: **1139514**

Name: **Nathan McLoughlin**

Organisation: **McLoughlin Planning**

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

PLEASE SEE ATTACHED FOR FULL REPRESENTATION Avant support the inclusion of LP1567 on page 21 & 22 of the document. In terms of the work required, there is considerable scope with the site to address all the points raised under -"Site Specific Considerations"Turning to constraints, it is important to note: "ç Elland Park Wood Ancient Woodland and Local Wildlife Site. "ç Park Wood Crematorium. These are not within the extent of the allocation, given that they are situated to the north of the site. Impacts on the constraints can be taken into account through appropriate masterplanning and landscape treatment. This is reinforced in the Vision Document prepared for the site.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5633063>

Comment ID **HRU2073**

Site ref (if applicable): **LP1567**

Person ID: **954176**

Name: **Mr & Mrs Philip & Catherine Howe**

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:

CALDERDALE LOCAL PLAN SITE LP 1567 ADJACENT TO EXLEY LANE We wish to object to the proposed development of the land adjacent to Exley Lane Elland. During the recent storms this land has been waterlogged and the properties on Park Road and Plains Lane have again been flooded. Elland Bridge was also closed for 24 hours, once again causing chaos, which would be far worse if this land was developed. There are also no plans for any extra infrastructure, such as schools and GP surgeries. Exley Lane, although there is supposed to be no through access between Elland and Halifax, is extremely busy and the road is not suitable for the amount of traffic using it. There is land between The Ainleys and Upper Edge, which used to be Hawkyard's Mink Farm, which is covered with disused pens. We think that this would be ideal for development, as it is high up and not liable to flooding and it would improve an untidy area. Please find below our original comments regarding the Local Plan, which we believe are still valid. CALDERDALE LOCAL PLAN SITE LP 1567 ADJACENT TO EXLEY LANE We would like to comment to the current proposed Local Plan, to which submissions close 29 th September 2017. GENERAL. We believe the large amount of proposed green belt and other out-of-town development will cause significant harm to the towns of Calderdale. As we understand it, the object of all development policies should be to reduce car usage, encourage all aspects of energy-efficiency (recycle land, re-use buildings, encourage urban development rather than developing on green belt land) , enhance the natural environment and promote healthy places

to live and work. It is our understanding that local and national policies are supposed to be in place to ensure these aims, instead, what we are faced with in this proposal are developments that we believe will achieve the exact opposite. The proposal will produce a car-centric mode of living which is highly energy-consumptive, unhealthy and will cause significant damage to the towns of the area, already struggling under a difficult economic situation. In particular Elland has suffered from many years of local government neglect and lack of investment. This has left large numbers of disused buildings and brownfield land in the area. By reusing these sites for housing, people would be brought back into the town centres. For example, in West Vale alone there are several large mills that could house several hundred people. These mills are an appealing part of the local architecture, sadly past decisions have seen some of the finest examples demolished. Some far-sighted schemes have been developed ; Valley Mills on Park Road, Elland for housing, and Dean Clough for employment, but in our opinion there have been nowhere near enough. We would suggest that the proposed plan be significantly re-drafted so as to take this opportunity to produce a plan of far greater imagination to incorporate far greater use of brownfield sites (irrespective of size) and less greenfield development.

**PROPOSED SITE LP1567 EXLEY LANE ELLAND** Proposal LP1567 we believe is another example of the failed out-of-town housing development, as described above, which would result in the destruction of a very valuable area of greenbelt separating Elland from southern Halifax and it is completely at odds with everything the greenbelt policy is supposed to stand for.

**UNWARRANTED DEVELOPMENT WITHIN THE GREENBELT** The site lies within the greenbelt, and there are no circumstances that warrant the development within the greenbelt on the basis of -“exceptional circumstances.”

Calderdale has recently undertaken a review of the borough's greenbelt areas (as required by central government), and the area lying between Elland and Halifax (within which LP1567 lies) has been wholly confirmed as an area of highly sensitivity greenbelt. The review identified the whole area between Elland and Halifax as satisfying 3 of the 5 national greenbelt criteria, however we believe this is incorrect, as in fact it clearly satisfies 4 of the 5 criteria. Of the 5 criteria, the Calderdale review failed on Purpose 2 -“To prevent neighbouring towns merging into one another”

A plan view of the area between Elland and Halifax clearly shows that the greenbelt area forms a clear, and relatively narrow, green delineation between Elland and Halifax. For such a clear and important delineation not to fulfil Purpose 2 is clearly erroneous. We therefore can only conclude that this area of greenbelt vitally fulfills 4 of the 5 categories, namely Purposes 1,2,3 and 5. We believe Calderdale MBC is promoting this site as an area for housing and therefore is attempting to dilute the area's greenbelt value, which could be why Calderdale has awarded the area only 3 instead of 4 of the greenbelt Purposes. Further, Calderdale has introduced at this very late stage 2 new greenbelt requirements of its own invention, these being additional to the commonly understood 5 national Purposes. These requirements have been termed as -“Green Belt review (Site Specific)”

these new requirements being contained within the -“Site Assessment Report ; Main Report”

Calderdale has assessed the site as meeting neither of these 2 new requirements. We cannot find anywhere what these -“Green Belt review (Site Specific)” criteria are and no one else whom we have spoken to, know what they are either, and this includes a professional planning consultant. It cannot therefore be fair and reasonable to expect interested lay-persons to be able to comment on these new criteria. For the site to be designated as housing, it has to be shown that there be an exceptional circumstance that warrants it to be changed from its current greenbelt designation. We believe there are a number of more suitable brownfield sites close to LP1567, which could be utilized.

**UNSUSTAINABILITY OF THE SITE** We understand and are not against the need for housing development, however, it should be designed and situated so as to improve the quality of life for existing and future residents. Such development should be as -“green” as possible (which means re-using buildings, materials etc), and create good-quality, affordable housing. Large greenbelt developments do not do this, as they create car-centric housing which favours those already afforded housing assets. We believe that within a few hundred metres of LP1567 there exists considerable scope for a potential superior range of developments which could create a similar number of dwellings, and result in a positive impact on the urban environment, rather than destroying valuable greenbelt. For example along Park Road there is Whiteley's Mill, which apart from some industrial use at ground level is semi-derelict and could be redeveloped. Further along the

road there is a field which used to be a football pitch and the stone wall adjacent to the road has been left semi-built since the floods of Boxing Day 2015, which also could be developed. Across the canal at the bottom of Gas Works Lane, there is the semi derelict old Roberts Fuel Depot and adjacent to that the old Chicken Factory which could also be developed. The Riverside - "Park" adjacent to Century Dyeing is another potential site as this is used on a minimal basis. The old Lockwoods Carpets Mill on Halifax Road is another potential site, as is the old Pillings Print Factory, which is derelict and an eyesore at the bottom of Westgate in Elland. There are also at least 3 mills in West Vale with potential development opportunity for housing. SUMMARY Calderdale MBC has a policy (- "SD1") stating that there is a presumption in favour of sustainable development. We object to this initial draft LP1567, as we believe that it is a non-sustainable use of greenbelt land and it favours out-of-town housing developments, which are predicated on car usage. We believe site LP 1567 is completely unsustainable as: The construction phase will entail large amounts of energy consumption, far in excess that of re-purposing existing buildings, or re-using brownfield sites. The construction phase will use large amounts of new (ie, not recycled) materials. The construction phase does not re-use existing derelict buildings (of which Calderdale has a large supply). The development consumes a large amount of greenbelt land. The dwellings will be more energy consumptive than the alternative of having a similar number of dwellings on a much smaller site, contained within the urban area, in a single ( or small number) of larger buildings, such as the re-purposing of mills. It relies very heavily on car usage to fulfil nearly all work and leisure activities. It takes no account of infrastructure, roads, schools, hospitals, doctors surgeries etc. Insufficient use of brownfield sites. We also object as we believe this is unwarranted release of greenbelt site LP1567 for housing and there are no exceptional circumstances which warrant this. There are a significant number of brownfield sites very close to LP1567 that would provide a far better solution to the housing needs of the area, and contribute to an improved living environment for Elland and Calderdale. We object to the late introduction of new greenbelt requirements - - "Green Belt review (Site Specific)" as these do not appear to be in the public domain for comment. Thank you for your consideration

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2079**

Site ref (if applicable): **LP1567**

Person ID: **1243832**

Name: **Mrs Emma Staniuszko**

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:

Please accept this email as our strong objection to the above development, for the following reasons.

**Flooding** The area of land which you propose to build upon regularly floods when there is heavy rainfall. In the 2015 floods, and the more recent Storm Ciara, Plains Lane was completely cut off from Park Road by the water. Residents had flooded cellars. If the proposed development goes ahead, the flooding will get worse as the fields won't be there to soak it up and the water will inevitably end up on Park Road. Effectively flooding the houses on Park Road from both sides (from the canal and Plains Lane)!! Please see attached photos of the back of Plains Lane and the bottom of Park Road from the recent Storm Ciara. How can it be justified that a housing development is being built upon this land?!

**Access/Highways** There is only one access to the proposed site ; through Plains Lane. The roads are a nightmare as it is during peak times, without the added (at least!) 246 cars making this problem worse! The roads can be backed up for miles if there is an accident on the motorway, as Park Road is a major route from Elland to Brighouse. It doesn't help with the masses of temporary traffic lights everywhere either! I can't see how the roads will be able to cope with the extra traffic if the housing development goes ahead.

**Infrastructure** There is already a shortage of doctors and school places. What is going to happen when there are 246 (at least!) new occupants looking to register at doctors surgeries and schools for their children?!

**Wildlife** The fields behind Plains Lane have regular visits from wildlife such as deer, hares, foxes and birds and it would be a shame to see this wildlife moved from their home! There are plenty of brownfield sites that could be built upon instead, why aren't these being considered instead of building on our beautiful greenbelt land?

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5633491> ; <http://calderdale-consult.objective.co.uk/file/5633490>

Comment ID **HRU2081** Site ref (if applicable):

Person ID: **1139959** Name: **Ms Maureen Crabtree** 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:

Site Ref LP1567 I am writing to strongly object to the proposed site allocation at Exley lane, Elland. The reasons for my objections are detailed below - **Flooding** The field acts a sponge for water when there is heavy rain. In the past there has been significant flooding on the Park Road area and I feel this would be made significantly worse if the proposed plan goes ahead. Drainage would be a huge problem. It could cause houses in Plains Lane to flood in the cellars, which has happened previously. The water continuously



drains onto the back lane at Plains Lane and road near Valley mill and the company Colson floods in heavy rain fall. The floods of December 2015 and those again in 2020 are indicative of difficulties the area has currently with flooding and this proposal shows a complete lack of insight into the repercussions this will have on the local community and their homes. The area is currently under review from the environmental agency, and a flood plan is being implemented. Building 450 houses will not support the current plan and in my view undermine all the work already completed. Elland Bridge was closed for over a year following the last flood in Dec 2015 and I feel that further flooding would be inevitable should this plan go ahead.

**Highways** With 450 new houses proposed it is highly likely we could have over 800 cars. The current roads are unsuitable for more traffic. I am unsure of how this will be managed; I cannot (within the plan) see any proposed adaptations to surrounding roads and infrastructures. If this is needed, who will pay for this in these times of austerity with so many council cut -backs. The surrounding roads are already heavily congested at peak times. Access to the site appears unsuitable and not sufficient for the many cars using the route. The already congested roads would become gridlocked. Would this lead to a 'rat run' through Siddal? I worry what the impact would be on the roads in the Siddal area, where there have been many accidents already; this has led to a 20 mph speed limit. This would cause serious delays and be a complete inconvenience to those who use the roads. More importantly I am worried about the impact this would have on human life when we consider about the potential for accidents and injuries if too many people are trying to use roads which are not equipped. It is likely to have further cumulative impact on the M62 junctions than would a more even distribution of allocated sites across the borough.

**Ecology** The councils own Employment Land Review recommended that this land should not be used as it provides an important role in safeguarding the countryside from encroachment. There is a vast amount of wildlife which would be lost including rabbits, deer, foxes and variety of birds and insects. The land currently provides a home to farm animals.

**Green belt** National planning guidelines in NPPF required that major alterations to green belt land should only be considered in exceptional circumstances. Building 450 houses does not meet this requirement. Particularly when there are numerous other buildings which could be converted and low cost housing already for sale and empty within the local area which could be used before building new houses. Green belt is a wonderful resource for everyone in society. Green belt is so important for local wildlife in the area such as foxes, deer, rabbits and a variety of birds and insects. The site acts as an effective barrier against urban sprawl from the built up areas of Elland and Exley/ Siddal. There is a strong argument for this land to remain 'open space' as it allows a degree of separation between Elland and Halifax.

**Accessibility** Building on this land would increase numbers attending local schools, doctor's surgeries and dentists which are already oversubscribed. The land lies between Siddal and Elland but neither are easily accessible without cars. There are not regular bus routes or shops.

**Additional comments** I strongly object to the plan to build houses on the proposed site. It seems that the devastating impact that this will have on the residents and wildlife in the local area has not been considered. I urge the objections to be fully deliberated prior to any final decision. Once a Green Belt land has been used it cannot be taken back and the damage will already be done. I would suggest that the land remains in use as it currently is and if houses are needed to use brownbelt land, current derelict buildings if appropriate or use some of the perfectly suitable empty houses which are for sale in the local area if there is requirement for more homes.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5633500> ; <http://calderdale-consult.objective.co.uk/file/5633499> ; [http://calderdale-](http://calderdale-consult.objective.co.uk/file/5633499)

Comment ID **HRU2114**

Site ref (if applicable):

Person ID: **1246859**

Name: **Chris & Tracey Ker**

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:

Please accept this email as our strong objection to the above development, for the following reasons.

**Flooding** The area of land which you propose to build upon regularly floods when there is heavy rainfall. In the 2015 floods, and the more recent Storm Ciara, Plains Lane was completely cut off from Park Road by the water. Residents had flooded cellars. If the proposed development goes ahead, the flooding will get worse as the fields won't be there to soak it up and the water will inevitably end up on Park Road. Effectively flooding the houses on Park Road from both sides (from the canal and Plains Lane)!! Please see attached photos of the back of Plains Lane and the bottom of Park Road from the recent Storm Ciara. How can it be justified that a housing development is being built upon this land?!

**Access/Highways** There is only one access to the proposed site ; through Plains Lane. The roads are a nightmare as it is during peak times, without the added (at least!) 246 cars making this problem worse! The roads can be backed up for miles if there is an accident on the motorway, as Park Road is a major route from Elland to Brighouse. It doesn't help with the masses of temporary traffic lights everywhere either! I can't see how the roads will be able to cope with the extra traffic if the housing development goes ahead.

**Infrastructure** There is already a shortage of doctors and school places. What is going to happen when there are 246 (at least!) new occupants looking to register at doctors surgeries and schools for their children?!

**Wildlife** The fields behind Plains Lane have regular visits from wildlife such as deer, hares, foxes and birds and it would be a shame to see this wildlife moved from their home! There are plenty of brownfield sites that could be built upon instead, why aren't these being considered instead of building on our beautiful greenbelt land?!

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5633766> ; <http://calderdale-consult.objective.co.uk/file/5633765>

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Comment ID **HRU2194**

Site ref (if applicable):

Person ID: **956317** Name: **Mr & Mrs L & P Whitley** 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 write with our objections to the above. We agree that the following will be affected by building in this area. Our reasons are detailed below. Air Pollution Flooding Infrastructure Wildlife Traffic Congestion Loss of Public Space We own and live in an apartment in Valley Mills Elland. It is behind this mill where you are planning to build additional housing on what is green belt land. Here we see wildlife, deer, birds, foxes, rabbits on a daily basis, farmers use the fields for their animals and hay is harvested. Building houses will of course have affects on all of these. Over the 12 years we have lived here we have seen significant increases in traffic, it is extremely difficult to get out of the mills when we leave for work, again coming home too. It also has an increase on air pollution. We have also seen several floods in the area, the worst in 2015 when bridge was closed and more recently with storm Ciera the road in front of the mill flooded, into the car park, many surrounding properties and water streamed down the fields you intend to build on. I attach recent photographs of our car park and fields to the rear of valley mills. Surely it is not acceptable to build here with such risks, and no investment into flood protection. The small roads surrounding the mills could not take the impact of the traffic generated by new homes. There has been no development of a proposed railway station so there will be no reduction in traffic. We have only one small doctors that we struggle to get an appointment at! I trust you will consider our points raised as reason to not proceed with planning in this area. I understand there are many others in the mill and surrounding properties that will also be against this application.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5634748> ; <http://calderdale-consult.objective.co.uk/file/5634749> ; <http://calderdale-consult.objective.co.uk/file/5634750> ; [http://calderdale-consult.o](http://calderdale-consult.objective.co.uk/file/5634751)

Comment ID **HRU2222**

Site ref (if applicable):

Person ID: **1176547** Name: **Mr Conrad Thwaites** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

SEE ATTACHED FOR FULL REPRESENTATION

Do you consider the plan to be Sound?:

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION

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

Duty to Co-operate Reason:

SEE ATTACHED FOR FULL REPRESENTATION

Suggested Modifications:

SEE ATTACHED FOR FULL REPRESENTATION

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5635138>

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Comment ID **HRU2250**

Site ref (if applicable):

Person ID: **1243960**

Name: **Mr Andrew Steer**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

SEE ATTACHED FOR FULL REPRESENTATION

Do you consider the plan to be Sound?:

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION

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

Duty to Co-operate Reason:

SEE ATTACHED FOR FULL REPRESENTATION

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5635293> ; <http://calderdale-consult.objective.co.uk/file/5635294> ; <http://calderdale-consult.objective.co.uk/file/5635296>

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Comment ID **HRU2258**

Site ref (if applicable):

Person ID: **1246937**

Name: **Emma Sharpe**

Organisation: **Inspector of Historic Buildings and Areas**

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 FOR FULL REPRESENTATION The site specific considerations for several of the proposed allocations refer to -“consideration of recommendations in the Heritage Impact Assessment” In order for the development of these allocations to be compatible with not only national policy guidance but also the Plan's policies for the conservation of the historic environment, these mitigation measures need to be implemented as part of any development proposals. Consequently, mitigation measures need to be firmly and effectively tied into any eventual site specific policies. Unfortunately, as worded, the policy suggests that development need only 'consider' the recommendations, with no requirement for the design of a scheme to put into effect the proposed mitigation measures. We therefore consider it has not been shown that these sites could be developed in a manner which would not harm the setting of heritage assets in the vicinity. This is an issue we raised at Publication Draft stage (our letter of 18 September 2018). We are currently working on a Statement of Common Ground with your authority, aiming to agree wording to effectively tie the recommendations of the Heritage Impact Assessments to the relevant Local Plan policies. If it is proposed to proceed with the additional site allocations we recommend this would also apply to those sites.

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

Duty to Co-operate Reason:

Suggested Modifications:

Amend Site Specific Consideration to ensure no harm to setting of heritage assets in the vicinity.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5635295>

Comment ID **HRU2271**

Site ref (if applicable): **LP1567**

Person ID: **956317**

Name: **Mr & Mrs L & P Whitley**

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 COMMENT WAS RECEIVED AFTER THE CLOSURE OF THE REPRESENTATION PERIOD (TO BE READ IN CONJUNCTION WITH HRU2194). Further to my objection, I would like to add that due to a land slippage last night and the closure of Elland Bridge this morning it took me over 2.5 hours to do what is usually a 55 minute journey to work. An hour was spent trying to get to Brighouse, through roads that could not take traffic let alone heavy traffic. This once again highlights that the closure of the Elland bridge can cause traffic chaos, and is further evidence of potential problems at the site of Exley Lane. I realise that the closing date has passed but feel you should be aware of this.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU2284**

Site ref (if applicable): **LP1567**

Person ID: **1243832**

Name: **Mrs Emma Staniuszko**

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 COMMENT WAS RECEIVED AFTER THE CLOSURE OF THE REPRESENTATION PERIOD. Due to the weather conditions yesterday afternoon, there was a landslip on Park Road which resulted in a crack in the road (which has obviously closed the road). There has also been a serious crash at the Elland Bridge junction in the early hours of this morning, closing that part of the road also. This means residents are now being forced to use a -"no through" road on Exley Lane, putting (extra!) pressure on the surrounding roads. We had similar issues in the 2015 floods where Elland Bridge collapsed, closing the road for 2 whole YEARS ! It is absolutely ridiculous that we are expected to put up with this disruption, which only seems to be getting worse as time goes on. How can the above area of land even be up for discussion for development, when there are so many issues surrounding it?!

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5635588> ; <http://calderdale-consult.objective.co.uk/file/5635591>

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Comment ID **HRU2288**

Site ref (if applicable): **LP1567**

Person ID: **949781**

Name: **Mr James Roberts**

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 COMMENT WAS RECEIVED AFTER THE CLOSURE OF THE REPRESENTATION PERIOD. I appreciate that the consultation period closed last night at 17.00 for any further comments , but this road closure occurred last night after that time period. This road is called Elland Road to Brighouse ,and is the continuation of Park Road which was closed recently due to the flooding caused by the overflow from the canal and the excess water which ran off the fields where the new development is planned. Elland Road is now closed , which is causing problems for people who have to attend Elland Crematorium . You can see that the recent flooding has caused large long cracks in the road and pavement , so that Calderdale Council have classed it as a risk area and subsequently closed the road . There is a large steep embankment on the side of the road , which is cordoned off with the fear that the road may totally collapse. All this along with the closure of Elland bridge two weeks ago , and then having to be rebuilt in 2015 . It does not bode well for Park Road and Elland Road if another 450 houses are built on the green belt fields , which currently still soak up some of the excessive rainfall. I would be grateful if you could bring this matter to the Inspector's attention , as i believe it will be useful extra knowledge when she comes to make any decisions.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5635624> ; <http://calderdale-consult.objective.co.uk/file/5635622> ; <http://calderdale-consult.objective.co.uk/file/5635623> ; <http://calderdale-consult.objective.co.uk/file/5635625> ; <http://calderdale-consult.o>

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Comment ID **HRU2299**

Site ref (if applicable):

Person ID: **1140095**

Name: **Malcolm James**

Organisation: **Greetland & Stainland  
Liberal Democrats**

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:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5635657> ; <http://calderdale-consult.objective.co.uk/file/5635658> ; <http://calderdale-consult.objective.co.uk/file/5635659> ; <http://calderdale-consult.objective.co.uk/file/5635660> ; <http://calderdale-consult.o>

Comment ID **HRU2334**

Site ref (if applicable):

Person ID: **1247032**

Name: **Mr/Mrs Unknown  
Unknown**

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:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5636973>

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Comment ID **HRU2336**

Site ref (if applicable):

Person ID: **1247034**

Name: **Mr/Mrs Unknown  
Unknown**

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:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5636975>

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Comment ID **HRU36**

Site ref (if applicable): **LP1567**

Person ID: **952437**

Name: **Mrs Sara Ackroyd-Pearson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

As I live in very close vicinity to the site, I have received NO information from the council with regards this re-addition to the local plan. It has taken a Facebook action group to highlight this re-addition to object to. Surely some form of communication to local residents should be the minimum who could be seriously impacted by the seemingly underhand inclusion.

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

Sound Reason:

The re-addition of this site is ludicrous given it is green belt and a natural flood defence for water run off from the surrounding hills. As a resident who was flooded out of our property on Park Road in the Boxing Day floods 2015, the sheer recklessness of planners to increase the risk of flooding from a different angle is mind boggling. The drains through the the fields in question along with the drains at the bottom of Plains Lane stem the flow of water. On more than one occasion the drains have not been able to cope with the sheer volume of rainwater coming from the woodlands. If you add 400+ houses onto that giant soak away the water will have nowhere else to go but Park Road. There is no access to the site other than Plains Lane which is already heavily congested with parked cars without the addition of heavy goods vehicles attempting to access the site during any construction works. There will then be the addition of all the cars once the properties have been built. There is also no rail link near by for commuters, the local schools are already at capacity as are the local health services. The additional of 400+ houses will probably break these services. Traffic along Park Road is already at ridiculous levels especially the high number of arctic vehicles trying to get to either Elland or Brighouse. If these houses are built, the amount of heavy goods vehicles would increase exponentially and therefore the fumes emitted. As an asthmatic the thought of fumes from the construction and then from the additional cars using the road will be detrimental to my health. The other main objection would be the massive detrimental affect of the local wildlife. As someone who has lived on Park Road most of my life, I have seen all manner of creatures and birds whilst living here. Any building will rob future generations of the joy of seeing these creatures so close to home. Building will also rob generations of children a clean, green space to play.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU38**

Site ref (if applicable): **LP1567**

Person ID: **954938**

Name: **Mrs Helen Flockton**

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:

As previously advised, this whole area is greenbelt. The natural barrier of the River Calder separates the greenbelt from the town. Not only is the river a natural barrier, the canal increases the barrier then the Elland by-pass increases the barrier even more. In the Government White Paper, "Fixing our broken housing market" February 2017, it states that green belt boundaries should only be amended in EXCEPTIONAL CIRCUMSTANCES.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU40**

Site ref (if applicable): **LP1567**

Person ID: **1240641**

Name: **Mrs Jean Thompson**

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:

Accessibility not suitable, where would this be? Exley Lane already a 'Rat run' Plains Lane busy with parked vehicles, access to Park Road which is already a very busy thoroughfare. Proposed 450 houses? Could create another 900 cars causing air pollution! Flooding! On a flood plain already, re 5yrs ago, our garage was flooded, obviously the homes on Park Road. Woodlands Road is permanently wet from the field. There are apartments below street level, what impact would flooding have on their homes?? The council previously said that the field had a slight incline, in fact it's as steep as Salterhebble Hill. Wildlife: Deer, Herons, Hares, Fox to name a few, don't think a 10m buffer would encourage them. Infrastructure : Doctors surgery closing in Elland soon, will probably feed into Bankfield Surgery, so appointments will be difficult without an extra 1,800 possible patients. We the residents of Valley Mill are concerned about living OVER a building site, air pollution from this. Recreational noise & noise in general The proposed building of houses is on a green belt. Esther McVey comments on written policy on the Green Belt, quotes that one of the most environmental safeguards we have is the Green Belt & that she wanted to be clear that the commitment protecting the Green Belt goes beyond protection against development.

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

Duty to Co-operate Reason:

Suggested Modifications:

Non building on this field is a recipe for trouble

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5587656>

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Comment ID **HRU45**

Site ref (if applicable): **LP1567**

Person ID: **1240813** Name: **Mrs Carole Pearson** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

Esther McVey Policy on preserving green belt

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

Sound Reason:

1) The proposed site is a steep slope which runs with rivers of water when it rains. If the land is disturbed this may increase and more water may rush down into the road at the bottom. Some apartments in the building at the bottom are underground and the water may flood into them. The drainage under the existing road must be very old and will not cope with extra water. 2) The land is green belt used as farm land and, as well as farm animals has deer, hares and other animals and birds using it. 3) Access There is no obvious access to this land as Exley Lane is overused and is narrow and winding. 450 houses would probably mean an increase in up to 900 extra cars and additional service vehicles. There is no regular bus service on Park Road and none up Exley Lane 4) There is only one doctors surgery in Ell and it is over subscribed and the junior school is over crowded. 5) There would be a huge increasing in pollution, Park Road is extremely busy with constant traffic and fumes. There would also be a tremendous amount of pollution caused by the builders when Calderdale is aiming to reduce carbon emissions.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU488**

Site ref (if applicable): **LP1567**

Person ID: **1242696** Name: **Mrs karen carless** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

I live in Valley Mill, close to the land and I have received NO information from the council with regards this re-addition to the local plan. This has been submitted previously and objections were raised to stop this. We were advised that planning could not be submitted again for a number of years. I was advised to that

effect. This seems to have been forgotten / ignored.

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

Sound Reason:

This land is only accessible via roads which are already above capacity use. One being Elland Bridge which has had major damage previously meaning closure for over 12 months. This was almost the case again this weekend after major flooding. Park Road already struggles with drainage issues and flooded again this weekend, as the council are aware. The fields presently soak up some water. If this land was hard surface all would flow towards Valley Mill and Park Road. This would mean potential for the ground floor apartments to flood, on top of the houses which already flood. The water would flow from both sides of the apartments and houses on Plains Lane and Woodlands Road. There are numerous spaces of brown belt land which would better serve new housing. TH green belt in Calderdale is little and far between. IT needs to be preserved for nature and for the residents of Calderdales well being. There is so much wildlife on that land. A family of deer was spotted all last summer. Elland is a small town and could not cope with more housing. The schooling and GP surgeries already struggle. The infrastructure cannot support this at all.

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

Duty to Co-operate Reason:

The council has stated previously that it would not build on areas liable to flooding. After building on Lowfields flooding has occurred on Park Road, directly next to Lowfields. This land is directly above a flood risk area and would increase any damage already sustained.

Suggested Modifications:

To build on brown Belt Land

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5603435>

Comment ID **HRU497**

Site ref (if applicable): **Lp1567**

Person ID: **1140261**

Name: **Mrs Jen Clutterbuck**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Ancient woodland and area

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

Sound Reason:

Flood risk and flood plane going down into plains lane area from the fields. The Land is not stable or suitable to build on. Given that the area has recently flooded yet again , and water was running down these fields, it would be absurd to build here. It would cause further issues and for the residents further

down. You would be creating more problems building here and the new residents would be flooded. You need to plant more trees in this area instead of building houses Ancient woodland and pasture area which should not be destroyed and should be conserved. It is home to protected animals nd wildlife such as badgers, bats, hedgehogs , deer, foxes, many birds. We should be protecting our green belt not destroying it! Traffic would be an issue adding more traffic coming into an already congested area especially at peak times another absurd idea to create more of a problem and adding to pollution

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU555**

Site ref (if applicable): **LP1567**

Person ID: **1242982** Name: **Mrs Laura Wright** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

I can only assume that the correct legal process has been followed, although I am concerned and disappointed that, following the objections in 2017, this is again under consideration.

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

Sound Reason:

Increased Road Traffic Park Road is already a congested route, especially during peak hours. With the potential of an additional 900 vehicles requiring access to travel across Elland Bridge or to A629 slip road to Halifax, the traffic situation would become untenable. As Valley Mill residents, we already experience long delays waiting to turn onto Park Road into the extremely heavy traffic flow. There is currently residents-only access with no through traffic to Halifax via Exley Lane, but with the building of 450 houses on the Park Road side of Exley, this rule would become impossible to enforce, with traffic opting to use this route to Halifax instead of the more congested Park Road and A629 route. 2) Local Infrastructure From a review of the Plan, there appears to be no consideration given to the local infrastructure to support the residents of the additional 450 homes. I am very concerned about the impact of the extra population on local doctors, dentists and schools, which already appear to be over-subscribed. 3) Flooding The field to the rear of Valley Mill banks quite steeply. In fact, there is a fall of 40 metres from the houses at the end of the cul-de-sac off Exley Lane to Woodlands Road. This is comparable to Salterhebble Hill from the traffic lights at the top to the Shell garage at the bottom! There is, therefore, a risk that the apartments in our development that are below street level would be subject to flooding. In fact, on Sunday 9 February 2020, the yards of the apartments adjacent to Woodlands Road had considerable water ingress. We know that when it rains heavily, the company to the rear of the Mill, Colson, floods, and in winter the field is permanently water-logged, with water continuously draining onto the road to the rear of Valley Mill.

Already, the properties alongside Park Road are unable to secure flood insurance due to the flood risk from the adjacent canal. Building homes to the rear of these properties would exacerbate the issue, meaning that these houses risk being flooded from both sides. Indeed the ground floor of the communal garage at Valley Mill was flooded such that all vehicles had to be relocated to higher ground to avoid flood damage. Whilst additional traffic and the impact on local infrastructure would be life affecting for residents on a daily basis, I feel the risk and dangers of any large scale building adversely impacting on drainage, in these times of increased adverse wet weather events, would mean a higher likelihood and frequency of flooding on a huge scale.

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

Duty to Co-operate Reason:

I can only trust the Duty to Co-operate has been complied with.

Suggested Modifications:

Regarding Soundness of the plan, especially in relation to the flood risk, the only acceptable outcome is for the land to remain Green Belt.

Comments:

Additional Evidence Link:

Comment ID **HRU644**

Site ref (if applicable): **LP1567**

Person ID: **1243057**

Name: **MRS Pauline Holland**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I am a resident of Plains Lane and have received no information from the council with regards to this re addition to the local plan .Objections have been raised previously and we were informed that planning could not be submitted for a number of years.Has the policy on preserving greenbelt been ignored.Is this underhand?

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

Sound Reason:

I object strongly to this proposal of building 450 dwellings for the following reasons : 1) FLOODING : I have lived in Plains Lane for 40 years .The fields flood regularly in heavy rainfall even with the introduction of new drainage systems which still seem unable to cope when the storm drains are overwhelmed.Residents at the bottom of plains lane have their cellars flooded .We have recently had the misfortune of being severely flooded with the 2015 Boxing day floods and more recently storm CIARA on Feb 9th 2020 in which we were totally cut off and unable to get out of Plains Lane onto Park Road .LP1567 falls within the indicative critical drainage area data provided by CMBC .How can the use of hard landscaping( preventing the field acting as a natural sponge ) help to cure the current inadequate drainage system we are having to deal with. 2)ACCESS/HIGHWAYS :Roads are already struggling to cope .Exley lane is supposed to be ACCESS ONLY ,however it is still being used as a short cut to Halifax. The road is extremely tight with twists and

turns. The site will be difficult to access at Exley Lane and Plains Lane. Plains lane is already congested and difficult to get out onto Park road at peak traffic times, with the introduction of a further 450 dwellings this will add to traffic congestion and put intolerable pressure on an already overcrowded road network not to mention the consideration of air pollution. 3) INFRASTRUCTURE: Schools are already oversubscribed, there is no way they would be able to accommodate such an increase in population. There are currently only 2 GP surgeries in Elland and with the proposed closure of Meadowdale Surgery leaves only one which is unlikely to add to an extremely heavy, busy caseload. There is no bus service in Exley lane and a very infrequent bus service from Park road to Elland. This housing proposal would fill the urban sprawl between Elland and Halifax destroying open space 4) GREENBELT: Greenbelt land is a wildlife habitat for Deer, foxes, owls, bats, several species of birds. Impact on loss of habitat as well as farming and agriculture (meadow hay and grazing for sheep and cows). This area of green belt is a natural wildlife corridor. Ancient woodland of Park Wood lies within 150 metres of it, Elland wood would be lost to housing which currently provides a natural source of beauty and will affect views from the crematorium. When we objected to previous building plans in 2016 we were told that there was sufficient Brownbelt land to leave ALL our greenbelt areas in Elland untouched. The proposed plans contradict previous proposals voted on by local councillors. How can you plan to decimate Greenbelt land

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

Duty to Co-operate Reason:

If this relates to residents being informed and formally consulted regarding to planning and changes to local plan then NO I strongly object to the duty of care.

Suggested Modifications:

Build on Brownbelt land

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5606372>

Comment ID **HRU655**

Site ref (if applicable): **LP1567**

Person ID: **958013**

Name: **Mr Godfrey Wormald**

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 this letter to strongly protest about the proposed building of new properties on the greenbelt land off Exley Lane. This is the only green belt between Halifax and Elland which will stop the spread of urban sprawl and make Elland a suburb of Halifax. As you are no doubt aware green belt can only be built on in exceptional circumstances, being the fact that there is adequate brownfield sites available to build these houses on and would give local small building firms the chance to keep the money in the local area. I feel that the council is taking the easy way out as usual. The only people that would be in favour of building



on this land would be the owners of the land and multi million pound building companies (e.g Barretts and Belway etc ) These fields are prone to flooding and as I write this letter there are small rivers running down the fields from Southowram causing flooding on Park road. Park road has been flooded three times in the last 10 years and if houses are built on this land there will be no water absorption and the run off will be catastrophic to the properties on park road. Exley Lane is a small country lane and if there is supposed to be another 450 houses to be built near to the road it will make Exley lane impassable . In these fieldsthere is4 deer, and we have had deer in these fields for the past 5 years ,they live in the railway cutting next to the field together with a family of foxes these we see regularly.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU656**

Site ref (if applicable): **LP1567**

Person ID: **954250**      Name: **Ms Susan Wormald**      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 strongly object to your plans to build houses on green belt land up Exley Lane. This greenbelt is there for a reason and separates Elland from neighbouring towns. There are ample brownfield sites available where new houses can be built, but as usual the council are trying to take the easy option. The fields up Exley Lane already have flooding problems which in the past and this week causes catastrophic damage to properties in the area. any building on this land would make it even more of a problem.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU862**

Site ref (if applicable): **LP1567**

Person ID: **1243576**

Name: **Mr Mark Greenwood**

Organisation: **Officer Valley Mill residents**

Agent ID: **1243574**

Name: **Mr MW Greenwood**

Organisation:

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

Legal Compliance Reason:

1) Increased Road Traffic Park Road is already a congested route, especially during peak hours. With the potential of an additional 900 vehicles requiring access to travel across Elland Bridge or to A629 sliproad to Halifax, the traffic situation would become untenable. As Valley Mill residents, we already experience long delays waiting to turn onto Park Road into the extremely heavy traffic flow. There is currently residents-only access with no through traffic to Halifax via Exley Lane, but with the building of 450 houses on the Park Road side of Exley, this rule would become impossible to enforce, with traffic opting to use this route to Halifax instead of the more congested Park Road and A629 route. 2) Local Infrastructure From a review of the Plan, there appears to be no consideration given to the local infrastructure to support the residents of the additional 450 homes. We are very concerned about the impact of the extra population on local doctors, dentists and schools, which already appear to be over-subscribed. 3) Flooding We would challenge the reference on the web site to the proposed building land being a slight slope. The field to the rear of Valley Mill banks quite steeply. In fact, there is a fall of 40 metres from the houses at the end of the cul-de-sac off Exley Lane to Woodlands Road. This is comparable to Salterhebble Hill from the traffic lights at the top to the Shell garage at the bottom! There is, therefore, a risk that the apartments in our development that are below street level would be subject to flooding. In fact, on Sunday 9 February 2020, the yards of the apartments adjacent to Woodlands Road had considerable water ingress. We know that when it rains heavily, the company to the rear of the Mill, Colson, floods, and in winter the field is permanently waterlogged, with water continuously draining onto the road to the rear of Valley Mill. Already, the properties alongside Park Road are unable to secure flood insurance due to the flood risk from the adjacent canal. Building homes to the rear of these properties would exacerbate the issue, meaning that these houses risk being flooded from both sides.

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

Sound Reason:

Please find attached a list of 45 individuals who own property at HX59GY & HX59GZ who would be directly and adversely affected by this plan and who object to this planning

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

Duty to Co-operate Reason:

Please find attached a list of 45 individuals who own property at HX5 9GY & HX5 9GZ object to this plan.

Suggested Modifications:

None

Comments:

Additional Evidence Link:

<http://calderdale-consult.objective.co.uk/file/5608876> ; <http://calderdale-consult.objective.co.uk/file/5611735>

Comment ID **HRU864**

Site ref (if applicable): **LP1567**

Person ID: **1243138**

Name: **Ms Janina Campbell**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

There appears to be none or little consideration of the requirements of NPPF section 13 Paragraphs 133 to 136 in the preservation of Green Belt Land to avoid urban sprawl. Just amending the previous plan does not make it compliant. Halifax has a plethora of brown field sites but have they been dismissed because only a few houses could be built. Is this site an -"easy" option.

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

Sound Reason:

This plan is not detailed sufficiently to prove it's soundness for reasons listed below: 1. The big buzz word after the last couple of weekends is FLOOD. If this whole field is built on then, what is going to soak up the excess water during the ever more frequent storms both in winter and summer? During storm Ciara there were 5 fast flowing streams rolling down the hill which then merged into the flood along Park Road. The drains along Park Road cannot cope now!!! 2. Wildlife does not read signs that there is a buffer for them. I have watched hare, foxes deer, geese and herons on this field as well as the sheep grazing and hay making during the summer. This is Green Belt land. 3. There is an already stretched infrastructure in Elland. One Doctor, one NHS dentist, schools full to capacity. Little of no public transport. 4. Inadequate road structure. The A629 is already congested and with the construction of the new -"bypass" is likely to get even more so. Exley Lane is currently access only and is not a through road and Plains Lane is a residential road not a thoroughfare.

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

Duty to Co-operate Reason:

Suggested Modifications:

All of the considerations listed must be addressed before this plan should be approved. There is in sufficient detail in the outline and as we all know once the land has been allocated there is no going back.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5608882> ; <http://calderdale-consult.objective.co.uk/file/5608874>

Comment ID **HRU866**

Site ref (if applicable):

Person ID: **949781**

Name: **Mr James Roberts**

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 will be commenting upon the local plan by the official channel shortly, but wondered in the mean time if you would forward these photographs to Katie Child the Inspector. They show what happens on the Greenfield site after one night of heavy rainfall, where the water rises to the surface from all the underground springs and then the excess water collects at the bottom of the field and floods the gardens and houses on Plains Lane. Furthermore, as happened over the week end, the trail continues down Plains Lane onto Park Road and closes the road, along with Elland Bridge. Once the 450 houses are built, there will be a vastly reduced amount of soak away land, so that the flooding problem on Park Road will only get worse.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5608904> ; <http://calderdale-consult.objective.co.uk/file/5608903> ; <http://calderdale-consult.objective.co.uk/file/5608902>

Comment ID **HRU867**

Site ref (if applicable):

Person ID: **952752**

Name: **Mr Richard Lupson**

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 intend to be commenting on the Local Plan in relation to the above site in due course, however I feel that the weekend's flooding events need to be brought to the Inspector Katie Child with some urgency. I should be grateful if you could forward this email to her. Please find below a link to a Google Documents repository containing pictures and links to 2 YouTube videos from the weekend's flooding event. The photographs clearly show again the effects of rain on the field which is part of the site which constitutes LP1567 Land adjacent to Exley Lane, North of Elland. The inundation of surface water run off was unprecedented in the 20 years I have lived here. The field floods in this way after heavy rain but never as badly as this. Much of the run off is captured by land drains, but these can be clearly seen to be unable to

cope and the run off (also shown) contributes to flooding in Plains Lane cellars and runs down to Park Road contributing to the flooding and serious damage to property there. All photos have file names which describe what they represent. Please note that despite what weather and news reports say about the Calder Valley floods this weekend, we have had no significant rain in Elland for over a week. An anticipated 450 houses on this site will adversely the soak away potential and run off could potentially be more dramatic no matter what mitigation is put in place. In my opinion mitigation needs to start at Brighouse and work up the valley. Developments approved need to be away from High risk flood areas. Here are the links: Pictures: [https://drive.google.com/drive/folders/1V\\_Erl3ILCStQeiPx1iHi0bUv4h4uEAYF?usp=sharing](https://drive.google.com/drive/folders/1V_Erl3ILCStQeiPx1iHi0bUv4h4uEAYF?usp=sharing) Videos: <https://youtu.be/DfyILYT0MpU> and <https://youtu.be/S1gVPWllmk8> Please copy and paste if links dont show.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU876**

Site ref (if applicable): **LP1567**

Person ID: **1243589** Name: **Mrs Victoria Porritt** 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:

This site is of particular concern in relation to the already significant flood events that occur at the bottom of the road. There is already significant ground water run-off from this field and during the recent storms it was like a river running down the hillside, adding to the river water. Not only would surface water flooding be a significant issue for the houses on the site but the reduction in the permeability of the land that would result from so much building would impact on flooding for the existing properties on Park Road. Flood defenses for this area have already been ruled by the Environment Area to be too costly and I'm very concerned about increasing the vulnerability of existing properties.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU964**

Site ref (if applicable): **LP1567**

Person ID: **1243804**

Name: **Mrs Julie O'Shea**

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 plan for a development of new houses on this land. I live in Valley Mill & this is the second time we have been flooded. The field acted as a sponge but there were several streams activated in the field due to the excess amount of rain. The water ran like a fast flowing river down the field and then caused deep flooding to the side street and Park Road. Our underground car park was also flooded. Park Rd was then closed with no access either direction. If houses were built this would cause devastating floods in the future for us & surrounding properties. I also object due to the current traffic using Park Road, this is a main link road to the motorway & is always congested. If upto 900 cars were added from the build this would become grid locked. The land is also a natural habitat for many species of wildlife including deer, foxes etc, it is also grazing land for cows & sheep. There are many other possibilities for building instead of building on green belt land.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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## **Main Issues and Council Response**

### **Legal Compliance**

Main Issues:

1. Ineffective consultation with residents.
2. Has the policy on Green Belt been ignored? Lack of exceptional circumstances. Would result in coalescence.

3. Local road network, specifically congestion and capacity.
4. The Council have taken it upon themselves to revise the Green Belt Review (splitting a larger packet of land and reassessing it as LP1567) without consultation, and therefore the plan is legally non-compliant.
5. Infrastructure - Lack of/pressure on existing amenities, services and facilities in the local area, e.g. schools, doctors, utilities.
6. Flooding - increased risk of flooding, exacerbated by topography. Poor drainage. A fully integrated SuDS system is essential.
7. Utilise brownfield sites in Halifax.
8. Impact on ecology
9. The plan is now dated and is no longer fit for purpose.
10. The site should not have been readded to the Local Plan.
11. Increase in air pollution
12. Impact on public right of way
13. Adverse impact on health and wellbeing.
14. The presence of a housebuilder or developer on board should not be a reason to select a site for allocation.
15. Impact on archaeological assets.

**Council's Response:**

1. Extensive and inclusive consultation has been carried out throughout all stages of the Local Plan preparation process in accordance with the Council's adopted Statement of Community Involvement and is detailed in the Consultation Statement (Regulation 22).
2. The NPPF states that once established, the green belt should only be changed in exceptional circumstances during a development plan review. This issue has also been addressed under 'Soundness'.
3. This issue has been responded to under 'Soundness'.
4. This issue has been responded to under 'Soundness'.
5. This issue has been responded to under 'Soundness'.
6. This issue has been responded to under 'Soundness'.
7. This issue has been responded to under 'Soundness'.
8. This issue has been responded to under 'Soundness'.

9. 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. 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.

10. Following receipt of the Inspector's Stage 1 hearing letter (INS 07), the Council commissioned further analysis of the relationship between Calderdale's housing requirement and the Council's growth aspirations. As a result of this work, the housing requirement has been increased, and consequently there are a number of additional site allocations required to meet this increased need. Additional sites were assessed using the existing methodology (EV 51.1), and the sequential approach employed in the Publication Draft Local Plan, tempered by the consideration of a site's strategic significance and its ability to deliver wider regeneration and infrastructure benefits.

11. This issue has been responded to under 'Soundness'.

12. Where sites contain public footpaths, schemes will be expected to incorporate this in their layout, or if ultimately necessary, arrange for a suitable diversion.

13. Chapter 12 of the Local Plan (Health and Well Being) and guidance contained within the NPPF highlight the role of the planning system in supporting health, social and cultural wellbeing and creating healthy, inclusive communities. A health impact assessment (HIA) helps to ensure that health and wellbeing are being properly considered in planning policies and proposals. Where sites contain public footpaths, schemes will be expected to incorporate this in their layout, or if ultimately necessary, arrange for a suitable diversion.

14. The selection of sites has been undertaken in accordance with the Site Allocations Assessment Methodology Statement, Publication Draft 2018 (EV51.1). The presence of a housebuilder or developer was not an overriding reason for the allocation of a site. However, the Council is mindful of the requirement in NPPF to ensure the Local Plan identifies specific deliverable sites for years 1 -5, and specific, developable sites or broad areas for growth for the later years of the Local Plan, to meet housing need.

15. A Predetermination Archaeological Evaluation is listed in Report Required. Policy HE3 also requires proposals affecting a Class III archaeological site should conserve those elements which contribute to its significance.

## **Test of Soundness**

### **Main Issues:**

1. Flooding - increased risk of surface water run off and surface water flooding, impacting on existing properties. Poor drainage. Evidence documents are not up to date and should be update, particularly in light of recent events. Knock on effects of mitigation elsewhere.

2. Local road network, specifically highway capacity, congestion, on street parking will exacerbate existing issues. An example being a land slippage on 24/02/20 causing the closure of Elland Bridge vastly increasing local travel times and adding to existing traffic congestion.

Site access would be unsafe given current congestion and on street parking. Impact on access to Crematorium.



The proposal will produce a car-centric mode of living which is highly energy-consumptive, unhealthy and will cause significant damage to the towns of the area.

3. Infrastructure - Lack of/pressure on existing amenities, services and facilities in the local area, e.g. schools, doctors. Lack of rail link. Pressure on existing infrastructure including Elland Bridge.
4. Pollution - Impact of development on air and noise pollution. Adjacent to incompatible uses.
5. Ecology - Impact on wildlife. Loss of habitat as well as agriculture. Loss of ancient woodland.
6. Green Belt - loss of most sensitive Green Belt. No exceptional circumstances. Disagree with assessment.
7. Consideration should be given to brownfield sites, such as Whiteley's Mill, Roberts Fuel Depot, the Riverside "Park", Lockwoods Carpets Mill and Pillings Print Factory (all within close proximity to the site).
8. Loss of agricultural land.
9. Development would not be in keeping with context or scale of the area.
10. Loss of amenity
11. Mines present on the site.
12. Impact of industrial uses on residential amenity/impact of houses on operations of nearby businesses.
13. The landowner does not wish to develop the southern part of the site. Capacity should be reduced.
14. It has not been shown that these sites could be developed in a manner which would not harm the setting of heritage assets in the vicinity. Mitigation measures need to be firmly and effectively tied into any eventual site specific policies.

#### Council's Response:

1. The site is located 100% within Flood Zone 1 and 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 site is considered to be suitable for development after a detailed Hydrological Assessment is carried out of both Plains Lane Drain and Wood Nook Drain, and a surface water assessment. 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.
2. The Council considers that the evidence submitted supports and justifies the content of the Local Plan. The Council has commissioned transport modelling that is robust and fit for purpose. The Transport Assessment in any planning application would need to assess impact on local road network. The Council consider that site access is achievable given the site size and frontage. The policies within the Local Plan support the achievement of the Local Plan Transport Objective, 'To ensure the provision of a sustainable, safe and efficient transport system which reduces car dependency and improves quality of life through a balance of promoting economic growth, enhancing environments and

improving transport access for communities'

To achieve these objectives the Council is developing a range of strategies and interventions, and the Local Plan has a role to play in supporting these, but also ensuring development proposals meet these objectives and contribute more widely to an integrated 'active mode' network.

The IDP proposes a number of key schemes which will allow development in line with the aspirations of Calderdale while reducing the impacts on the transport network. The planned growth has been targeted spatially in areas where access to alternative modes of transport (other than the private car) are best, in order to reduce reliance on cars for travel.

Detailed Information on transport infrastructure in Calderdale is provided in Chapter 13: Infrastructure and Master Planning of the Local Plan and in the WSP Technical Reports (EV54.1 – EV54.12) in the Local Plan Examination Library. No concerns have been raised regarding impact on access to Park Wood Crematorium.

3. The Infrastructure Delivery Plan is a compendium of projected infrastructure provision and it helps to ensure that this infrastructure is provided in a timely manner and in a coordinated and sustainable way. It sets out the infrastructure that will support the level of development that is proposed in the Calderdale Local Plan. The IDP is a living document, updated on at least a yearly basis and contains chapters on healthcare, education provision, utilities and public transport.

4. A Noise Impact Assessment will be required to be submitted with any planning application. The Environmental Health Section have not raised concerns regarding air quality, 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.

5. The Conservation Section (Ecology) has indicated that development would be acceptable subject to various mitigation measures which have been included as site specific considerations. In addition, policies within the Green Infrastructure and Natural Environment chapter of the Local Plan, specifically Policy GN3, set out a clear and positive strategy to ensure the Council effectively manages its natural environment. Additionally, BT3 - Landscaping, ensures that new development integrates appropriately into its surroundings, contributes to the character of the area, and enhances local biodiversity.

6. The purpose of the Green Belt Review is to provide an understanding of the current strengths and weaknesses of the existing Green Belt and provide the basis for recommendations to change the Green Belt where appropriate. In order to assess Green Belt land against the NPPF purposes, a set of questions for each purpose has been developed including the need to prevent neighbouring towns from merging into one another and to preserve the setting and special character of historic towns.

In terms of the site assessment process, in order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area, only using the most sensitive Green Belt when all alternative sites were used.

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. 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.

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.

7. The allocation process requires a willing land owner and developer in order to demonstrate the deliverability of the sites and therefore whilst there are aspirations to use as much brownfield urban land as possible this may not always be demonstrably deliverable. In terms of the site assessment process, in

order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area, only using the most sensitive Green Belt when all alternative sites were used.

8. The site assessment process seeks to protect land which is of higher quality in terms of the Agricultural Land Classification. The site consists of predominantly Grade 3 Agricultural Land which is not considered "high quality".

9. Policy BT1 ensures development respects or enhances the character and appearance of existing buildings and surroundings, taking account of its local context, distinctiveness and identity.

10. Policy BT2 - Privacy, Daylighting and Amenity Space of the Built Environment Chapter ensures that development proposals do not result in a significant adverse impact on the privacy, daylighting and private amenity space of adjacent residents or other occupants and provide adequate privacy, daylighting and private amenity space for existing and prospective residents and other occupants.

11. If sites are in a Development High Risk Area, a Coal Mining Risk Assessment will need to be submitted to the Local Planning Authority (LPA) to support any planning application. The Coal Mining Risk Assessment will need to identify site specific coal mining risks and set out the proposed mitigation strategy to show that the site can be made safe and stable for the development being proposed.

12. The Council's Environmental Health Section have highlighted that noise from adjacent commercial uses should be considered, as well as impacts on existing employment activities. A Noise Impact Assessment will be required.

13. The Council has not received any evidence that suggests the landowner is not willing to develop the whole site.

14. The Council has prepared a Statement of Common Ground with Historic England, and has agreed amended wording for the Site Specific Considerations for sites included in the Publication Draft Local Plan. This wording will be amended for all additional sites in this consultation.

## **Duty to Co-operate**

### **Main Issues:**

1. The Council has relied on the public having internet access to make comments. Publicity has been restricted to electronic communication with people who have successfully registered to use the portal.

2. Loss of Green Belt, lack of exceptional circumstances. Creation of urban sprawl.

3. Utilise brownfield sites first.

4. Infrastructure - Lack of/pressure on existing amenities, services and facilities in the local area, e.g. schools, doctors.

5. Local road network, specifically highway capacity, congestion, on street parking will exacerbate existing issues.

6. Proposal does not conform with policy and legislation on flooding. Increase in flood risk. Poor drainage.

7. Ecology - loss of ecology.
8. Increase in air and noise pollution.
9. Impact on archaeological site.

**Council's Response:**

1. The Council has followed the Statement of Community involvement and the regulatory framework in undertaking consultations. The Consultation Statement for the Publication version of the plan indicates the extent of this work. (Examination Library Document numbers: SD04.1 and SD 04.2).
2. This issue has been responded to under 'Soundness'.
3. This issue has been responded to under 'Soundness'
4. This issue has been responded to under 'Soundness'
5. This issue has been responded to under 'Soundness'
6. This issue has been responded to under 'Soundness'
7. This issue has been responded to under 'Soundness'
8. This issue has been responded to under 'Soundness'
9. A Predetermination Archaeological Evaluation is listed in Reports Required. Policy HE3 also requires proposals affecting a Class III archaeological site should conserve those elements which contribute to its significance.

**Suggested Modifications**

1. Remove this site from the Local Plan and retain the land as Green Belt.
2. In light of the recent flooding the local plan should be revised when the new NPPF becomes available in the spring.
3. Amend Site Specific Consideration to ensure no harm to setting of heritage assets in the vicinity.

**Council's Response:**

1. No change required - The allocation of the site is considered to be consistent with the Council's site allocation methodology and positioning in the trajectory as set out in the Housing Technical Paper. 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.
2. No change required - 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.

3. Agreed. The Council has prepared a Statement of Common Ground with Historic England, and has agreed amended wording for the Site Specific Considerations for sites included in the Publication Draft Local Plan. This wording will be amended for all additional sites in this consultation.

## Document Section: Site number LP1616 Land at Ainley Top, South West of the Juncti

### Representations

Comment ID **HRU101**

Site ref (if applicable): **LP1616**

Person ID: **1105049**

Name: **Mr Peter Bond**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Not enough done to publicise the fact that amendments to the LDP have been made, and as far as I'm aware there has been a complete lack of any local community involvement regarding this site.

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

Sound Reason:

Lack of adherence to Green Belt guidelines, in particular sites with a high score in the Council's own Green Belt Review have been included for development whilst many parcels of land scoring 0-2 have been excluded. I'm also concerned that the desire to develop land quickly, i.e. "developer on board" may have been a key reason on whether a particular location is included in the LDP. Is the council able to publish (by Ward) on the website for the public to see: 1) How many sites in the original Green Belt survey scored 0-2 and 3-5. 2) What percentage of each have been included in the latest LDP. 3) What percentage of sites for each Green Belt category included and excluded in the LDP have "developers on board".

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5593656>

Comment ID **HRU1971**

Site ref (if applicable):

Person ID: **851345**

Name: **Planning Policy Kirklees Council**

Organisation: **Kirklees Council**

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:

Kirklees Council note that the site assessment has considered the Castle Hill Setting Study, listed buildings to the north-east of this site and the position of the ancient woodland in proximity to this site. It is noted that mitigation has been proposed in the site policy box through the removal of the eastern part of the site from the indicative developable area but Kirklees Council consider that the site policy box should be amended to specifically state that this part of the site should remain open in accordance with the Heritage Impact Assessment findings.

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

Duty to Co-operate Reason:

Suggested Modifications:

The site policy box should be amended to specifically state that this part of the site should remain open in accordance with the Heritage Impact Assessment findings.

Comments:

Additional Evidence Link:

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Comment ID **HRU201**

Site ref (if applicable): **LP1616**

Person ID: **1241991**

Name: **Mrs Steve Beales**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Until full details are provided including a sustainability report is prepared it is impossible to judge if legally compliant.

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

Sound Reason:

There are already significant new builds in the local area with no additional infrastructure such as doctors, dentists, schools etc. In addition the traffic volume and pollution is an increasing health concern to the existing residents which has not been addressed.

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

Duty to Co-operate Reason:

I have not seen their report on duty to co-operate

Suggested Modifications:

No further building and leave green spaces green! As a council there are already innumerable complaints and fly tipping locally which you do not deal with and additional housing will only make this matter worse.

We are not managing our current environment!

Comments:

Additional Evidence Link:

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Comment ID **HRU202**

Site ref (if applicable): **LP1616**

Person ID: **1241993**

Name: **Mr Christopher Mason**

Organisation:

Agent ID:

Name:

Organisation:

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 three issues with this plan going forward. Is the amount of housing - 48 extra houses seems like quite a significant amount for such a little village. What else might happen in the area, especially on the field opposite this site on New Hey Road. Most importantly is the infrastructure especially around traffic. Living in the village it is clear that people use the village as a cut through to avoid Ainley Top Roundabout. This sometimes causes significant traffic at busy times and also speeding cars at quite times. Infrastructure would have to additionally thought about to not impact these roads more. Other infrastructure also needs to be thought about.

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

Duty to Co-operate Reason:

Suggested Modifications:

I would suggest really thinking about road infrastructure. Speed limits and enforcement about not being a cut through.

Comments:

Additional Evidence Link:

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Comment ID **HRU2104**

Site ref (if applicable):

Person ID: **1182211**

Name:

Organisation: **Thornhill Estates**

Agent ID: **1182209**

Name: **Miss Rachel Flounders**

Organisation: **ID Planning**

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:



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

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION Table 4 identifies site LP1616 as an additional housing site that could deliver 48 dwellings based on a site size of 2.19 hectares and a developable area of 1.6 hectares. Thornhill Estates supports the identification of this site as an additional new housing site, which will assist in meeting the revised housing requirement for Calderdale. The site is in a suitable location for development as it lies adjacent to the existing built extent of Ainley Top in Elland. The site is also well contained with New Hey Road to the north, Brighthouse Road to the east and south and residential dwellings to the west. There are no technical constraints to the development of this site and it is controlled by a single landowner (Thornhill Estates), who also owns the proposed employment allocation site LP0021 immediately to the north of site LP1616. The following technical reports were prepared for the site and submitted to the Council in January 2009:- Transport Assessment Noise Assessment Ecological Assessment Flood Risk Assessment Drainage Assessment Ground Condition Survey Access Study The reports demonstrate there are no physical or technical constraints that would prevent the development of the site. The site is therefore available for development, it is in a suitable location for residential development and is deliverable. We support the Council in its assessment of the site and its proposed allocation for housing

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5633671>

Comment ID **HRU2259**

Site ref (if applicable):

Person ID: **1246937**

Name: **Emma Sharpe**

Organisation: **Inspector of Historic Buildings and Areas**

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 FOR FULL REPRESENTATION The site specific considerations for several of the proposed allocations refer to -“consideration of recommendations in the Heritage Impact Assessment” In order for the development of these allocations to be compatible with not only national policy guidance but also the Plan's policies for the conservation of the historic environment, these mitigation measures need to be implemented as part of any development proposals. Consequently, mitigation measures need to be firmly and effectively tied into any eventual site specific policies. Unfortunately, as worded, the policy suggests

that development need only 'consider' the recommendations, with no requirement for the design of a scheme to put into effect the proposed mitigation measures. We therefore consider it has not been shown that these sites could be developed in a manner which would not harm the setting of heritage assets in the vicinity. This is an issue we raised at Publication Draft stage (our letter of 18 September 2018). We are currently working on a Statement of Common Ground with your authority, aiming to agree wording to effectively tie the recommendations of the Heritage Impact Assessments to the relevant Local Plan policies. If it is proposed to proceed with the additional site allocations we recommend this would also apply to those sites.

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

Duty to Co-operate Reason:

Suggested Modifications:

Amend Site Specific Consideration to ensure no harm to setting of heritage assets in the vicinity.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5635295>

Comment ID **HRU846**

Site ref (if applicable): **LP1616**

Person ID: **1125503**

Name: **Mrs Julia Holden**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Not a legal expert but concerned that significant amendments have been made to the plan without adequate communication with affected residents. Feels like it's being done under the radar.

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

Sound Reason:

Full and valid decisions to reject certain sites were made after the original consultation and as none of the deciding factors have changed I fail to understand why this site is being deemed appropriate again.

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

Duty to Co-operate Reason:

As stated before, not publicised sufficiently.

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5608665>

## **Main Issues and Council Response**

### **Legal Compliance**

#### **Main Issues:**

1. Format of consultation was not effective.

#### **Council's Response:**

1. Extensive and inclusive consultation has been carried out throughout all stages of the Local Plan preparation process in accordance with the Council's adopted Statement of Community Involvement and is detailed in the Consultation Statement (Regulation 22).

### **Test of Soundness**

#### **Main Issues:**

1. Loss of Green Belt. Green Belt Assessment is incorrect. Utilise poorly performing Green Belt sites and brownfield site first.
2. Developability, i.e "developer on board"/desire to develop land quickly seems to been a key reason to as inclusion of a site.
3. Local highway network, specifically capacity and congestion at Ainley Top roundabout. No detail provided on mitigation.
4. Ecology - mitigation measures to reduce impact on Gernhill Wood are not appropriate or deliverable.
5. Loss of open space
6. Infrastructure - Lack of/pressure on existing amenities, services and facilities in the local area, e.g. schools, shops, doctors.
7. Noise and air pollution.
8. Level of development in the area.
9. Impact on flood risk.
10. Heritage - It has not been shown that these sites could be developed in a manner which would not harm the setting of heritage assets in the vicinity. Mitigation measures need to be firmly and effectively tied into any eventual site specific policies.

#### **Council's Response:**

1. The NPPF states that once established, the green belt should only be changed in exceptional circumstances during a development plan review.  
Document EV 09 Exceptional Circumstances for the Release of Green Belt (2018) considers the process that the Council has followed in relation to the potential need to release land from the Green Belt. It can be seen that a methodical approach has been built into each stage of the process and that ultimately this process has dovetailed with the Government's emerging policy on exceptional circumstances. The

proposed changes to the Calderdale Green Belt are clearly a last resort and have been minimised. Furthermore, the boundary changes are essential to achieving a sustainable future for Calderdale – one that reconciles economic, social and environmental sustainability. With regards to the site assessment process, in order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area, only using the most sensitive Green Belt when all alternative sites were used. The Calderdale Green Belt Review is one of a number of studies which provides guidance for and informs the preparation of the Calderdale Local Plan. There may be other reasons why sites which are within low performing Green Belt parcels have not been allocated. These will be set out in the Site Reports for these sites.

2. The allocation process requires a willing land owner and developer in order to demonstrate the deliverability of the sites and therefore whilst there are aspirations to use as much brownfield urban land as possible this may not always be demonstrably deliverable.

3. The site assessment process considered highways issues, and concluded the site could be developed. The Transport Assessment submitted with a planning application would assess impacts on immediate area and identify any road layout changes. The Council has commissioned transport modelling that is robust and fit for purpose.

4. The Council's Conservation (Ecology) section are satisfied that the mitigation measures specified would make development of the site acceptable.

5. The site is currently designated as greenbelt but also performs the function of a natural/semi-natural open space. An assessment of open space in the area shows that there are sufficient alternative natural/semi-natural areas within the catchment of this site to meet the adopted standards. However if the site is designated for housing, open space would be required as part of any development since there are deficiencies in other typologies. The visual impact of any development should be considered.

6. The Infrastructure Delivery Plan is a compendium of projected infrastructure provision and it helps to ensure that this infrastructure is provided in a timely manner and in a coordinated and sustainable way. It sets out the infrastructure that will support the level of development that is proposed in the Calderdale Local Plan. The IDP is a living document, updated on at least a yearly basis and contains a chapter on healthcare and education provision.

7. The Council's Environmental Health Section has noted that air quality and the impact of additional road traffic taken cumulatively with other local developments would need to be considered. The impact of road traffic emissions on the residential development itself however would not be expected to be significant, and no breach of the air quality objectives for nitrogen dioxide and particulate matter is expected on site. Consideration should also be given to the impact of road traffic noise on the residential properties in the area, particularly those close to the southern boundary of the site.

8. 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. The Local Plan is supported by a large amount of evidence, and together with the site assessment process, it has been demonstrated that the level of housing growth can be accommodated.

9. A Flood Risk Assessment would be required in order to assess any risk of flooding and propose mitigation measures to reduce such risks. Concerns have been raised regarding flooding impacts of development on this site. However, the Council's Flooding and Drainage Section consider that development of the site is

suitable and mitigation could secure the area from flooding.

10. The Council has prepared a Statement of Common Ground with Historic England, and has agreed amended wording for the Site Specific Considerations for sites included in the Publication Draft Local Plan. This wording will be amended for all additional sites in this consultation.

### **Duty to Co-operate**

Main Issues:

1. Lack of effective public consultation.

Council's Response:

1. This issue has been responded to under 'Legal Compliance'.

### **Suggested Modifications**

1. The site policy box should be amended to specifically state that this part of the site should remain open in accordance with the Heritage Impact Assessment findings. Site Specific Considerations should be amended to ensure no harm to setting of heritage assets in the vicinity.

Council's Response:

1. Agreed. The Council has prepared a Statement of Common Ground with Historic England, and has agreed amended wording for the Site Specific Considerations for sites included in the Publication Draft Local Plan. This wording will be amended for all additional sites in this consultation.

## Document Section: Site number LP1625 Land to the west of, Silverdale Terrace, Gree

### Representations

Comment ID **HRU1013**

Site ref (if applicable): **LP1625**

Person ID: **1243830**

Name: **Mr Howard Wood**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

It does not comply with the NPPF

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

Sound Reason:

It is not consistent with the NPPF

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

Duty to Co-operate Reason:

The Calderdale Council Brownfield Land Register has not been updated since 2018. It is a legal requirement that this should be updated/reviewed annually

Suggested Modifications:

Remove these 'most sensitive Green Belt parcels' entirely from the Plan

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609670>

Comment ID **HRU1035**

Site ref (if applicable): **LP1625**

Person ID: **955878**

Name: **Mrs Susan Smallburn**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The plan does not meet national planning guidelines with regards to building on flood planes/run off areas or those regarding the use of brownfield rather than greenfield sites. Along with other sites, it also does not align with the Calderdale Council priority of managing and decreasing air pollution.

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

Sound Reason:

The plan does not meet national guidelines with regards to building on flood planes and run-off areas. This site is a well established run off area and building on it would negatively impact both houses on it and those surrounding it. Recent floods have demonstrated this perfectly. It also does not meet requirements to explore the use of brownfield sites in preference to greenfield sites and greenbelt. This site supports a varied wildlife population of foxes, deer, birds, frogs, etc which would be driven out of the area. This site (and the other 3) would hugely add to road traffic in the Saddleworth road area of Greetland. The area already suffers badly from road congestion (west vale traffic lights, around the infant school, Ripponden for the commuter path to the M62). Adding to this congestion is problem enough, but it will also build on air pollution in a narrow valley - where mist, smoke and any pollutants hang in the air low in the valley - just where the infant school is located! Calderdale Council have identified reducing air pollution as one of the strategic priorities in the area?!

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

Duty to Co-operate Reason:

A previous local plan had gone through an extensive consultation process with input from communities and councillors. This amendment was brought in with no consultation or discussion with very active local councillors.

Suggested Modifications:

Remove the site from the local plan

Comments:

Additional Evidence Link:

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Comment ID **HRU1043**

Site ref (if applicable): **LP1625**

Person ID: **1243857**

Name: **mr ralph brook**

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:

please see attached file

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1053**

Site ref (if applicable): **LP1625**

Person ID: **954528**

Name: **Miss Amanda Smith**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The application declares the land to be green field when it is in fact classified as green belt, evidenced by referring to the councils own map of the area. As green belt land should not be developed except in exceptional circumstances, none of which apply in this case, the application is not legally compliant.

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

Sound Reason:

This plan is not positively prepared as there does not appear to be any cooperation or advice sought from the relevant agencies who would be affected by the development. The plan is not justified as building on green belt land should only be undertaken in exceptional circumstances, none of which apply in this case. The plan is not effective as there is no plan to provide improvements to the infrastructure of the area or deal with the environmental impact that this development would create. The plan is not consistent with the national policy to refrain from developing green belt areas.

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

Duty to Co-operate Reason:

Duty to cooperate requires the developers to have consulted with other agencies that would be impacted by this development to obtain their views and advice on the development. There does not appear to be cooperation with any of the following: Local transport network agencies CCG or other healthcare providers Education providers Environmental agencies Natural habitat agencies Without advice and support from these local agencies there is no way that this development can be given planning permission as the impact on the local area cannot be safely determined.

Suggested Modifications:

As green belt land should not be developed there are no modifications that would make this development legally compliant or sound. The noncompliance with the Duty to Co-operate in itself illustrates how ill-thought out this proposal is, with no proper consideration of the impact on the local area.

Comments:

Additional Evidence Link:

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Comment ID **HRU1056**

Site ref (if applicable): **LP1625**



Person ID: **1243860**

Name: **Mrs Laura Rogers**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Greetland residents received no notification of these planning proposals with many residents finding out via Facebook. The Local Plan does not address the implications of the National Planning Policy Framework, in particular NPPF Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. According to the NPPF Para 143 under 'Proposals affecting the Green Belt' it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' The very special circumstances are non-existent in this site. This development would contribute to future flooding in the area. The plans have in do not take into consideration the impact on the infrastructure, environment and community, which will all be negative. Greetland Councillor Marilyn Greenwood stated that she was not even told about the Planning Meeting when this plot was added.

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

Sound Reason:

**CONSERVING AN HISTORIC ENVIRONMENT** This area has historical importance with archaeological finds on this site with a post medieval stone skull found and therefore an archaeological field evaluation needs to take place. By building on this site would be a disservice to the inhabitants of our past, destroying our local history. **LOSS OF GREEN BELT** Greetland has many brown field sights which should be built on first. There are a limited number of green belt sites in the village, so they should be protected at all cost. The land is used by residents, children and walking groups to enjoy local nature which has positive benefits on health and wellbeing, within walking distance for the community to enjoy. **FLOOD PLAIN** The land proposed for development is on a flood plain with natural springs flowing down the Greetland hillside with the land, hedges and trees acting as sponges with the land boggy after rain. This was demonstrated in February 2020 after the storms and building on this land would add to the existing flooding problems throughout Calderdale. **WILDLIFE** The local wildlife will be devastated by this development including birds such as Herons, Kestrels, Kingfishers, Owls and also Bats which are seen regularly in the area, along with Foxes, Deer **TRAFFIC CONGESTION** This development has only one road in and out which is already congested, and the new residents would need to use their cars as there are no regular busses and local schools are oversubscribed meaning parents would have to use their cars to take children to schools out of the area. It is already extremely timely to pass through the traffic lights at West Vale and the development will only add to the congestion both in West Vale and Ripponden. **AIR POLLUTION** There is already congestion on Saddleworth Road with cars sat in stationary traffic with engines running throughout peaks times. This new development has the potential to put an additional 1200 cars on the road all adding to the air pollution which will be breathed in by the children playing in the school yards next to the roads. **INFRASTRUCTURE** Greetland is a village not a town and the current infrastructure is simply not geared up to cope with 600+ houses in the area. Schools are full with no space to expand their buildings and facilities further. Doctors are full to capacity and Dentists already have long waiting lists. The traffic issues have been cited above.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1064**

Site ref (if applicable): **LP1625**

Person ID: **1243827**

Name: **Mrs Paula Chantler-Dobson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Please refer to Calderdale's Statement of Community Involvement, which has not been followed in this process. CMBC have already stated "These sites lies within the approved Green Belt. The proposed development does not meet the exceptions, as it does not preserve openness and conflicts with the purpose of including land in the Green Belt. As such, it represents inappropriate development in the Green Belt, which is, by definition, harmful. No very special circumstances have been demonstrated to clearly outweigh the harm caused by the development. It is therefore considered that the proposal would be contrary to NPPF Chapter 13 (Protecting Green Belt Land)"

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

Sound Reason:

The amount of traffic already on Saddleworth Road is becoming unacceptable especially when there is a problem with the M62 as commuters struggle to find alternative routes. This not only impacts on travel time but the pollution from the resulting congestion is an issue, not just for the residents of Saddleworth Road but also the children at Greetland Academy. At a time when the whole world is looking at the destructive effects of pollution on our children and reading through the Clean Air Strategy 2019 I cannot understand how this is not being taken into consideration. If the plans go ahead, with a proposition of 600 houses being built in such a compacted area, there realistically, will be a minimum of a further 600 cars (if they are all one car households, however most family households have two cars) added to our already congested roads. It will also put a massive strain on our overstretched infrastructure. Having lived on Saddleworth Road for over 16 years, the obvious attraction of buying in the area was of course the fact that the surrounding area was Green Belt and as such, have enjoyed the lifestyle that comes with it. The public right of way through the stretch of Green Belt land provides a much valued recreational place for our community. I use the area every day to walk my two large dogs, away from the increasingly busy roads, meeting many likeminded people also enjoying the area, building a fantastic community spirit which is sadly being lost elsewhere. The NPPF asserts the importance of protecting areas of tranquility which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason. The impact that the proposed buildings will have on our Greetland community is devastating, not only for the health and wellbeing of residents but also the social aspect. The importance of green space to communities should not be overlooked. On the Gov.uk website a study has been published by Natural England which reviews the benefits and outcomes of approaches to green care for mental ill health and states:"<sup>1</sup> A report published today (9 February 2016) shows that taking part in nature-based activities helps people who are suffering from mental ill-health and can contribute to a reduction in levels of anxiety, stress and depression'. This land is regularly used by many, including children and this is so valuable to the development of these young minds, away from screens and digital age technology. Being immersed in

green areas and experiencing wildlife first hand can only be beneficial to all. The fact that this area is Green Belt in part due to the wildlife corridor, makes it highly sensitive. The amount of wildlife that inhabits this green belt area is wonderful to see but the proposed building work will be catastrophic to the herons, woodpeckers, owls, duck, rabbits, hedgehogs, bats etc, that are regularly seen. I have also noticed in the last few years, more and more rainwater running down Saddleworth Road and flooding in the fields. Whilst the horrendous weather in the last few weeks has been experienced around the country, it should be noted that the flooding in the fields in Greetland, due to them acting as a natural flood defence, is a regular occurrence and with climate change predictions of worsening weather conditions, this is bound to increase the frequency of flooding. If the proposed building goes ahead, where will all the water go? The fields are soaking up large amounts of water at present, when these are covered in housing and tarmac the run off will be increased to an unsustainable level. It will impact not only Greetland but also communities further afield. There are many reports of buildings that have been erected on flood plains that have exacerbated issues of flooding for surrounding communities and is now such a problem that Boris Johnson PM has called for for councils to stop building on flood plains. There should not be building on high risk flood areas, or in extremely close proximity to high risk flood areas. Calderdale is most definitely a high risk flood area. Adrian Gill from the Environment Agency has said -“unfortunately, the Calder Valley is a unique flood risk. It's a very narrow steep sided valley and it doesn't take much to see flooding throughout the catchment right through many communities. We see rapid onset flooding; low onset flooding as well and quite a high risk to life”(BBC Look North / 12 February 2020). Surely there are other sites more suitable for building on? There is land in Stainland, which is on high ground and consequently has no issues of flooding, that has been saved from the plan. There is other brownfield land within Calderdale that has not been looked at and given that the amount of building proposed in Greetland is disproportionate to other areas in Halifax in addition to the previous reasons stated, I believe that the proposed plans are therefore not sound.

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

Duty to Co-operate Reason:

10 Elland Additional Housing Sites : I am at a loss to understand how Greetland can be categorised as Elland and find the heading very misleading. I wonder if this was to enable plans to go under the radar, so to speak, of concerned residents of Greetland. The fact that I only found out about the plans to build on the proposed sites and the extent of the development through a Facebook post, I feel, does not comply with the Duty to Co-operate.

Suggested Modifications:

Comments:

Additional Evidence Link:

|                                                              |                    |                           |               |
|--------------------------------------------------------------|--------------------|---------------------------|---------------|
| Comment ID                                                   | <div>HRU1070</div> | Site ref (if applicable): | LP1625        |
| Person ID:                                                   | 1243868            | Name:                     | Mr A BAIRSTOW |
|                                                              |                    | Organisation:             |               |
| Agent ID:                                                    |                    | Name:                     |               |
|                                                              |                    | Organisation:             |               |
| Do you consider the plan to be Legally Compliant?: <b>No</b> |                    |                           |               |

#### Legal Compliance Reason:

Green Belt I am not satisfied that the Council has demonstrated exceptional circumstances to justify the release of land from the Green Belt which would destroy valuable agricultural land. Section 11 in the NPPF outlines what is meant by the efficient use of land. It states that the Local Plan must follow planning policies and make decisions which encourage the efficient use of land by re-using land that has previously been developed (brownfield land). This has not effectively been carried out in the area. We have a number of undeveloped brownfield sites in the area, which have not been properly pursued. Traffic With the associated increase in traffic it would compound the road infrastructure especially around the junction with Saddleworth Road and Stainland Road. There has been no investment in this bottleneck where public transport offers no mitigation since buses are also trapped within the queuing traffic resulting commutes into Halifax in excess of 15 minutes and journeys to Hospitals approaching 60 minutes. The transport infrastructure is unable to support this development with access to the rail network being beyond 2 km. The Highways England have themselves suggested that the development of this site not to commenced until the completion of the Road Investment Strategy and then more enhancement is needed beyond 2030. Air Pollution With the increase in standing traffic from the 1200 cars (based on two cars per household from the proposed 600 houses) will also impact on air pollution around dwellings, schools and nursing homes. Such a disproportionally high increase in air pollution will have unthinkable implications for the children of our community. If the government has set targets to reduce air pollution then it does not make sense to allocate such a vast proportion of the overall planning to one area, along one road, where the pollution in the air will become concentrated and toxic. Economic growth The increased housing allocation within the Local Plan is based on projected economic growth, however as both the Inspector and the Council have acknowledged this calculation on based on assumptions. I would like to quote Councillor Sutherland when he addressed the Cabinet during a meeting on the 14th October 2019; "There were not many opportunities for the Council to make decisions in Planning, and once greenbelt sites were built on, there would be no opportunities to change this which would have a lasting impact on Calderdale. In essence, what were the tangible benefits on these sites and how would these be balanced and tested? - "With no evidence on economic growth, Green belt land is proposed to be developed which is unjustified. In a perverse way, residential dwellings close to industrial buildings will have a negative impact such as Sia Fibril/ Bosch. This is due to employer being unreasonably constrained to invest in the site due to emission legislations. The existing stack would be approximately 50m from the proposed site. The result could see a major employer to the area leaving Calderdale to develop an alternative site which does not support employment growth. The development will impact on access to open space which will negatively impact on mental health. Amenities Paragraph 94 of the NPPF states that ' It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: 28 a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and b) work with schools. The Local Plan in Greetland has not seen any of this work done in relation to the local junior schools. As far as parents and the local community are aware the local school has not been consulted on the Local Plan. Due to the fact that The Greetland Academy and West Vale School are academies, they cannot be pushed to expand, this is in direct opposition to the National Planning Policy Framework, and therefore not compliant. We know that the primary school is already oversubscribed. The scale of proposed development would completely overwhelm an already oversubscribed school. Children already living in Greetland may face a situation where there is no place available to them at their local junior school. There is also a very real increased risk posed to the children of Greetland Academy, should the proposed development go ahead. The local Doctors surgery is full and so do not have the capacity to take on more people in terms of health care. Therefore the development is not sustainable with the local economy unable to support the increase in population. Flooding Calderdale has experienced how unpredictable the water system is particularly in this area, we are constantly reminded of the topography of our landscape and the surrounding areas, and the impact it already has on our lives. Over thirty million

pounds has so far been spent on flood defences in Calderdale, and still we have to have the Army called in to help protect us from flood water. It is not right to build on the land in Greetland put forward in the Local Plan. Flooding cannot be militated against in this area. The land as it stands, is helping to prevent further disaster, and must remain as it is. To even suggest altering the way in which this land functions is an inappropriate and irreversible gamble. It is not fair to gamble with the lives of the community, when the community is so opposed to it. The NPPF states that the Local Plan should take account of climate change over a long period of time, including factors such as flood risks, changes to biodiversity and landscape. The NPPF also states that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. To so dramatically change the function of the landscape of the sites put forward for development in Greetland would completely disregard the risk climate change poses to the community on the form of flooding. The entire proposed site falls within a flood zone, where we have seen the impact of flooding in 2015 and more recently in February 2020. The risk of severe wide area flooding is increasing and therefore remains a high risk. To build on this site would compromise the flood storage area and no surface water drainage network, 10m cordon or green roofs will mitigate the risk of flooding as we have clearly seen up and down the Calder Valley. I would consider it immoral to allow home owners to purchase new homes with the prospect of not being able to obtain sufficient house insurance due to proximity of flood zones. Black Brook is a haven for wildlife and is a UK BAP priority habitat. Any development including access roads will have a negative impact to wildlife including deer and herons even with a proposed 10 m cordon due to noise, traffic light pollution. How can the Council consider developing a green belt land with such a rich wildlife and a high risk of flooding when there are other sites available?

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

Sound Reason:

Green Belt I am not satisfied that the Council has demonstrated exceptional circumstances to justify the release of land from the Green Belt which would destroy valuable agricultural land. Section 11 in the NPPF outlines what is meant by the efficient use of land. It states that the Local Plan must follow planning policies and make decisions which encourage the efficient use of land by re-using land that has previously been developed (brownfield land). This has not effectively been carried out in the area. We have a number of undeveloped brownfield sites in the area, which have not been properly pursued. Traffic With the associated increase in traffic it would compound the road infrastructure especially around the junction with Saddleworth Road and Stainland Road. There has been no investment in this bottleneck where public transport offers no mitigation since buses are also trapped within the queuing traffic resulting commutes into Halifax in excess of 15 minutes and journeys to Hospitals approaching 60 minutes. The transport infrastructure is unable to support this development with access to the rail network being beyond 2 km. The Highways England have themselves suggested that the development of this site not to commenced until the completion of the Road Investment Strategy and then more enhancement is needed beyond 2030. Air Pollution With the increase in standing traffic from the 1200 cars (based on two cars per household from the proposed 600 houses) will also impact on air pollution around dwellings, schools and nursing homes. Such a disproportionally high increase in air pollution will have unthinkable implications for the children of our community. If the government has set targets to reduce air pollution then it does not make sense to allocate such a vast proportion of the overall planning to one area, along one road, where the pollution in the air will become concentrated and toxic. Economic growth The increased housing allocation within the Local Plan is based on projected economic growth, however as both the Inspector and the Council have acknowledged this calculation on based on assumptions. I would like to quote Councillor Sutherland when he addressed the Cabinet during a meeting on the 14th October 2019; "There were not many opportunities for the Council to make decisions in Planning, and once greenbelt sites were built on, there would be no opportunities to change this which would have a lasting impact on Calderdale. In essence, what were the tangible benefits on these sites and how would these be balanced and tested? -

“With no evidence on economic growth, Green belt land is proposed to be developed which is unjustified. In a perverse way, residential dwellings close to industrial buildings will have a negative impact such as Sia Fibril/ Bosch. This is due to employer being unreasonably constrained to invest in the site due to emission legislations. The existing stack would be approximately 50m from the proposed site. The result could see a major employer to the area leaving Calderdale to develop an alternative site which does not support employment growth. The development will impact on access to open space which will negatively impact on mental health. Amenities Paragraph 94 of the NPPF states that ' It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: 28 a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and b) work with schools. The Local Plan in Greetland has not seen any of this work done in relation to the local junior schools. As far as parents and the local community are aware the local school has not been consulted on the Local Plan. Due to the fact that The Greetland Academy and West Vale School are academies, they cannot be pushed to expand, this is in direct opposition to the National Planning Policy Framework, and therefore not compliant. We know that the primary school is already oversubscribed. The scale of proposed development would completely overwhelm an already oversubscribed school. Children already living in Greetland may face a situation where there is no place available to them at their local junior school. There is also a very real increased risk posed to the children of Greetland Academy, should the proposed development go ahead. The local Doctors surgery is full and so do not have the capacity to take on more people in terms of health care. Therefore the development is not sustainable with the local economy unable to support the increase in population. Flooding Calderdale has experienced how unpredictable the water system is particularly in this area, we are constantly reminded of the topography of our landscape and the surrounding areas, and the impact it already has on our lives. Over thirty million pounds has so far been spent on flood defences in Calderdale, and still we have to have the Army called in to help protect us from flood water. It is not right to build on the land in Greetland put forward in the Local Plan. Flooding cannot be militated against in this area. The land as it stands, is helping to prevent further disaster, and must remain as it is. To even suggest altering the way in which this land functions is an inappropriate and irreversible gamble. It is not fair to gamble with the lives of the community, when the community is so opposed to it. The NPPF states that the Local Plan should take account of climate change over a long period of time, including factors such as flood risks, changes to biodiversity and landscape. The NPPF also states that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. To so dramatically change the function of the landscape of the sites put forward for development in Greetland would completely disregard the risk climate change poses to the community on the form of flooding. The entire proposed site falls within a flood zone, where we have seen the impact of flooding in 2015 and more recently in February 2020. The risk of severe wide area flooding is increasing and therefore remains a high risk. To build on this site would compromise the flood storage area and no surface water drainage network, 10m cordon or green roofs will mitigate the risk of flooding as we have clearly seen up and down the Calder Valley. I would consider it immoral to allow home owners to purchase new homes with the prospect of not being able to obtain sufficient house insurance due to proximity of flood zones. Black Brook is a haven for wildlife and is a UK BAP priority habitat. Any development including access roads will have a negative impact to wildlife including deer and herons even with a proposed 10 m cordon due to noise, traffic light pollution. How can the Council consider developing a green belt land with such a rich wildlife and a high risk of flooding when there are other sites available?

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1076**

Site ref (if applicable): **LP1625**

Person ID: **1243865**

Name: **mrs julie walker**

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:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609696>

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Comment ID **HRU1092**

Site ref (if applicable): **LP1625**

Person ID: **1241801**

Name: **Mr Will Priestley**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Please see attached pdf document "LP1625 - Main Points of Objection"

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

Sound Reason:

Please see attached pdf document "LP1625 - Main Points of Objection"

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

Duty to Co-operate Reason:

Please see attached pdf document "LP1625 - Main Points of Objection"

Suggested Modifications:

N/A

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609701>

Comment ID **HRU1106**

Site ref (if applicable): **LP1625**

Person ID: **1243870**

Name: **Mrs Melissa Bairstow**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Green Belt I am not satisfied that the Council has demonstrated exceptional circumstances to justify the release of land from the Green Belt which would destroy valuable agricultural land. Section 11 in the NPPF outlines what is meant by the efficient use of land. It states that the Local Plan must follow planning policies and make decisions which encourage the efficient use of land by re-using land that has previously been developed (brownfield land). This has not effectively been carried out in the area. We have a number of undeveloped brownfield sites in the area, which have not been properly pursued. Traffic With the associated increase in traffic it would compound the road infrastructure especially around the junction with Saddleworth Road and Stainland Road. There has been no investment in this bottleneck where public transport offers no mitigation since buses are also trapped within the queuing traffic resulting commutes into Halifax in excess of 15 minutes and journeys to Hospitals approaching 60 minutes. The transport infrastructure is unable to support this development with access to the rail network being beyond 2 km. The Highways England have themselves suggested that the development of this site not to commenced until the completion of the Road Investment Strategy and then more enhancement is needed beyond 2030. Air Pollution With the increase in standing traffic from the 1200 cars (based on two cars per household from the proposed 600 houses) will also impact on air pollution around dwellings, schools and nursing homes. Such a disproportionally high increase in air pollution will have unthinkable implications for the children of our community. If the government has set targets to reduce air pollution then it does not make sense to allocate such a vast proportion of the overall planning to one area, along one road, where the pollution in the air will become concentrated and toxic. Economic growth The increased housing allocation within the Local Plan is based on projected economic growth, however as both the Inspector and the Council have acknowledged this calculation on based on assumptions. I would like to quote Councillor Sutherland when he addressed the Cabinet during a meeting on the 14th October 2019; "There were not many opportunities for the Council to make decisions in Planning, and once greenbelt sites were built on, there would be no opportunities to change this which would have a lasting impact on Calderdale. In essence, what were the tangible benefits on these sites and how would these be balanced and tested? - "With no evidence on economic growth, Green belt land is proposed to be developed which is unjustified. In a perverse way, residential dwellings close to industrial buildings will have a negative impact such as Sia Fibril/ Bosch. This is due to employer being unreasonably constrained to invest in the site due to emission legislations. The existing stack would be approximately 50m from the proposed site. The result could see a major employer to the area leaving Calderdale to develop an alternative site which does not support



employment growth. The development will impact on access to open space which will negatively impact on mental health. Amenities Paragraph 94 of the NPPF states that ' It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: 28 a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and b) work with schools. The Local Plan in Greetland has not seen any of this work done in relation to the local junior schools. As far as parents and the local community are aware the local school has not been consulted on the Local Plan. Due to the fact that The Greetland Academy and West Vale School are academies, they cannot be pushed to expand, this is in direct opposition to the National Planning Policy Framework, and therefore not compliant. We know that the primary school is already oversubscribed. The scale of proposed development would completely overwhelm an already oversubscribed school. Children already living in Greetland may face a situation where there is no place available to them at their local junior school. There is also a very real increased risk posed to the children of Greetland Academy, should the proposed development go ahead. The local Doctors surgery is full and so do not have the capacity to take on more people in terms of health car. Therefore the development is not sustainable with the local economy unable to support the increase in population. Flooding Calderdale has experienced how unpredictable the water system is particularly in this area, we are constantly reminded of the topography of our landscape and the surrounding areas, and the impact it already has on our lives. Over thirty million pounds has so far been spent on flood defences in Calderdale, and still we have to have the Army called in to help protect us from flood water. It is not right to build on the land in Greetland put forward in the Local Plan. Flooding cannot be militated against in this area. The land as it stands, is helping to prevent further disaster, and must remain as it is. To even suggest altering the way in which this land functions is an inappropriate and irreversible gamble. It is not fair to gamble with the lives of the community, when the community is so opposed to it. The NPPF states that the Local Plan should take account of climate change over a long period of time, including factors such as flood risks, changes to biodiversity and landscape. The NPPF also states that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. To so dramatically change the function of the landscape of the sites put forward for development in Greetland would completely disregard the risk climate change poses to the community on the form of flooding. The entire proposed site falls within a flood zone, where we have seen the impact of flooding in 2015 and more recently in February 2020. The risk of severe wide area flooding is increasing and therefore remains a high risk. To build on this site would compromise the flood storage area and no surface water drainage network, 10m cordon or green roofs will mitigate the risk of flooding as we have clearly seen up and down the Calder Valley. I would consider it immoral to allow home owners to purchase new homes with the prospect of not being able to obtain sufficient house insurance due to proximately of flood zones. Black Brook is a haven for wildlife and is a UK BAP priority habitat. Any development including access roads will have a negative impact to wildlife including deer and herons even with a proposed 10 m cordon due to noise, traffic light pollution. How can the Council consider developing a green belt land with such a rich wildlife and a high risk of flooding when there are other sites available?

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

Sound Reason:

Green Belt I am not satisfied that the Council has demonstrated exceptional circumstances to justify the release of land from the Green Belt which would destroy valuable agricultural land. Section 11 in the NPPF outlines what is meant by the efficient use of land. It states that the Local Plan must follow planning policies and make decisions which encourage the efficient use of land by re-using land that has previously been developed (brownfield land). This has not effectively been carried out in the area. We have a number of undeveloped brownfield sites in the area, which have not been properly pursued. Traffic With the

associated increase in traffic it would compound the road infrastructure especially around the junction with Saddleworth Road and Stainland Road. There has been no investment in this bottleneck where public transport offers no mitigation since buses are also trapped within the queuing traffic resulting commutes into Halifax in excess of 15 minutes and journeys to Hospitals approaching 60 minutes. The transport infrastructure is unable to support this development with access to the rail network being beyond 2 km. The Highways England have themselves suggested that the development of this site not to commenced until the completion of the Road Investment Strategy and then more enhancement is needed beyond 2030.

**Air Pollution** With the increase in standing traffic from the 1200 cars (based on two cars per household from the proposed 600 houses) will also impact on air pollution around dwellings, schools and nursing homes. Such a disproportionally high increase in air pollution will have unthinkable implications for the children of our community. If the government has set targets to reduce air pollution then it does not make sense to allocate such a vast proportion of the overall planning to one area, along one road, where the pollution in the air will become concentrated and toxic.

**Economic growth** The increased housing allocation within the Local Plan is based on projected economic growth, however as both the Inspector and the Council have acknowledged this calculation on based on assumptions. I would like to quote Councillor Sutherland when he addressed the Cabinet during a meeting on the 14th October 2019; "There were not many opportunities for the Council to make decisions in Planning, and once greenbelt sites were built on, there would be no opportunities to change this which would have a lasting impact on Calderdale. In essence, what were the tangible benefits on these sites and how would these be balanced and tested? - "With no evidence on economic growth, Green belt land is proposed to be developed which is unjustified. In a perverse way, residential dwellings close to industrial buildings will have a negative impact such as Sia Fibril/ Bosch. This is due to employer being unreasonably constrained to invest in the site due to emission legislations. The existing stack would be approximately 50m from the proposed site. The result could see a major employer to the area leaving Calderdale to develop an alternative site which does not support employment growth. The development will impact on access to open space which will negatively impact on mental health.

**Amenities** Paragraph 94 of the NPPF states that ' It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: 28 a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and b) work with schools. The Local Plan in Greetland has not seen any of this work done in relation to the local junior schools. As far as parents and the local community are aware the local school has not been consulted on the Local Plan. Due to the fact that The Greetland Academy and West Vale School are academies, they cannot be pushed to expand, this is in direct opposition to the National Planning Policy Framework, and therefore not compliant. We know that the primary school is already oversubscribed. The scale of proposed development would completely overwhelm an already oversubscribed school. Children already living in Greetland may face a situation where there is no place available to them at their local junior school. There is also a very real increased risk posed to the children of Greetland Academy, should the proposed development go ahead. The local Doctors surgery is full and so do not have the capacity to take on more people in terms of health car. Therefore the development is not sustainable with the local economy unable to support the increase in population.

**Flooding** Calderdale has experienced how unpredictable the water system is particularly in this area, we are constantly reminded of the topography of our landscape and the surrounding areas, and the impact it already has on our lives. Over thirty million pounds has so far been spent on flood defences in Calderdale, and still we have to have the Army called in to help protect us from flood water. It is not right to build on the land in Greetland put forward in the Local Plan. Flooding cannot be militated against in this area. The land as it stands, is helping to prevent further disaster, and must remain as it is. To even suggest altering the way in which this land functions is an inappropriate and irreversible gamble. It is not fair to gamble with the lives of the community, when the community is so opposed to it. The NPPF states that the Local Plan should take account of climate change over a long period of time, including factors such as flood risks, changes to biodiversity and landscape. The

NPPF also states that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. To so dramatically change the function of the landscape of the sites put forward for development in Greetland would completely disregard the risk climate change poses to the community on the form of flooding. The entire proposed site falls within a flood zone, where we have seen the impact of flooding in 2015 and more recently in February 2020. The risk of severe wide area flooding is increasing and therefore remains a high risk. To build on this site would compromise the flood storage area and no surface water drainage network, 10m cordon or green roofs will mitigate the risk of flooding as we have clearly seen up and down the Calder Valley. I would consider it immoral to allow home owners to purchase new homes with the prospect of not being able to obtain sufficient house insurance due to proximately of flood zones. Black Brook is a haven for wildlife and is a UK BAP priority habitat. Any development including access roads will have a negative impact to wildlife including deer and herons even with a proposed 10 m cordon due to noise, traffic light pollution. How can the Council consider developing a green belt land with such a rich wildlife and a high risk of flooding when there are other sites available?

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1107**

Site ref (if applicable): **LP1625**

Person ID: **957626**

Name: **Mr Robert Birkby**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

As I understand the situation...the plan does not meet the NPPF guidelines in relation to building on green belt land. There are no 'very special circumstances' for building here. Quite the opposite. - The land type is listed as 'greenfield' on the Calderdale planning website, very misleading and incorrect. Is this legally compliant? The land is even listed as 'green belt' on the Calderdale Council's own interactive map. See my attached screen grab. -The area further down Saddleworth Road is a flood zone 3 on the government's national flood website - i.e. the worst case scenario 'land with a high probability of flooding' greater than 1 in 100. See <https://flood-map-for-planning.service.gov.uk/> . The last thing the area needs is more housing creating more surface water, and loss of soakaway land. -Climate change and the recent events since Storm Ceira mean the council must have a serious rethink. This area is not suitable for further development.

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

Sound Reason:

I realise the Council are under pressure to find housing sites but I'm struggling to think of a worse place for

development in Calderdale. Building here is not justified or consistent with national policy. Here are a few reasons:- - The high risk of flooding as many others have mentioned. If the events of the Boxing Day 2015 floods are regarded as a freak event, think again as floods seem to be a regular event. Even though this particular land does not flood, the extra surface water created by these houses, and the extra load on the drainage system (which already cannot cope, nor are maintained properly by the council) would massively contribute to further problems. Water has to go somewhere and we're losing soakaway land. Even if the new developments don't flood, other properties will. Calderdale Council should take the opinion of their own drainage engineers. They will tell you it's already a very problematic area for them. Greetland is full of culverts and underground water courses, aside from Black Brook. - The traffic congestion on Saddleworth Road is already terrible. Most notably, when people are doing the 'school run' or if there's a problem on the M62, the queue to Halifax can start up around Daleside, 0.8 miles from the West Vale traffic lights! Even on a normal day without M62 incidents the weekday wait time is unacceptable. To add hundreds of houses to this area (each with an average of 1.5 cars I believe?) is unthinkable. See attached photo. - Pollution from the above. - The education and healthcare providers in the area do not have the available capacity to support this number of families moving to the area. - Development is adding to the urban sprawl...the very reason that the land was designated green belt in the first place. - I can think of other areas of Halifax/Calderdale which are much less under strain from flooding and traffic congestion than this.

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

Duty to Co-operate Reason:

- This Calderdale portal seems designed to make objection difficult for the public to use with lots of legal jargon and acronyms. How many people know if the development is legally compliant? Who understands the duty to cooperate? - The Duty to cooperate

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609704>

Comment ID **HRU1119**

Site ref (if applicable): **LP1625**

Person ID: **1243878**

Name: **Mrs Claire Zoledziejewski**

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:

Risk of Floods's This terminology is used a few times on the proposals. I would suggest this is edited to read 'certainty of floods'. The areas closest to Black Brook on the flood plains have done exactly that for many years, more notably during the 2015 Boxing Day floods that blighted our region and during Strom Ciara on 9th Feb 2020. I have attached pictures for your reference of site number LP0177. The houses on Woodfield

Grange stand very close to the flood plain as it is, I can only imagine the catastrophic damage caused to these houses and the families that live in them if the flood plain and surrounding hill side was to be built on. As stated in the NPPF paragraph 155. ' Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.' Building on sites such as LP0592, LP0026 and LP1625 would only worsen this scenario as these areas act as a natural soak away to rain fall and surface water. If these sites were to be built on, surface water would flow directly down on the flood plain, which is already stretched during heavy rainfalls. To give you an idea of the amount of surface water on the aforementioned sites please see attached photos looking out onto the field on LP0592 which were taken on 09/02/20 only 20 minutes apart. The first at 10:45am, the second at 11:05am. Note how the swell of water has increased on the field so rapidly in that time, and how quickly that water would drain away, down the hillside and down to the new proposed housing. From there flow down towards Woodfield Grange and carry on further to the neighbouring towns of Elland and Brighouse. From the NPPF- ' 158. The aim of the sequential test is to steer new development to areas with the lowest risk of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.' - Flood plains are labelled as such for a reason, they are there to contain flood water and any breached rivers and streams. To take this away would be detrimental to the neighbouring communities. The council, and developers have obviously underestimated the severity of the flooding in this area of Greetland. Greenbelt & Wildlife Corridor As a resident of Greetland my entire life I have always been aware of how lucky I am to live in an area full of green fields, farms and moorlands. It is certainly one of the main reasons Greetland is such a sought-after place to own a property and bring up your children. Parts of the sites considered for this development are classed as sensitive Green Belt areas, and if I may quote the Governments own NPPF, paragraph 133- -“ 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.” Taking these green areas away, not only goes against the government's policy by creating urban sprawl it also takes away the green and semi-rural characteristics of our village, not to mention the adverse effects the developments will have on local wildlife native to the area including herons, crested newts, bats and hedgehogs to name but a few. Below is a paragraph from the NPPF- 134. Green Belt serves five purposes: a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. To build on site LP1625 would go against each and every one of these 5 purposes of Green Belt land. In reference to point 'e' I struggle to find the reasoning behind why available brownfield sites have not been considered for this local plan. I do understand that there is a housing crisis to address, and homes do need to be built but I feel that using Green belt areas- including flood plains- is a very poor judgement from our local Council. Infrastructure Aside from the fact this development is suggested for a known flood plain and green belt area, the volume of dwellings suggested across all four sites is overwhelming and disproportionate for Greetland as a village. 600+ houses on already one of the busiest roads in the area would just cause chaos for commuters, school drop off and collection as well potentially turning Sunnybank Drive into a rat run for frustrated drivers trying to access Rochdale road to avoid queues on Saddleworth road. At peak times this road can be very busy, especially as you get closer to West Vale traffic lights and passing the infant school. Adding (I estimate) 1200 cars to this scenario not only would cause peak time traffic to swell ten-fold but also become detrimental to the health and wellbeing of the children at the Sunnybank Pre School and Greetland Academy who would be subject to the car fumes and not to mention the danger that will be posed by the increase in traffic when crossing the road. Information from the World Health Organisation states; ' One reason why children are particularly

vulnerable to the effects of air pollution is that they breathe more rapidly than adults and so absorb more pollutants. They also live closer to the ground, where some pollutants reach peak concentrations ; at a time when their brains and bodies are still developing.' As a mother of young children this subject is a major concern. West Vale is overwhelmed by traffic at all times of day, although the new eateries and drinking establishments have brought more business to the area and West Vale is a hive of activity it does mean most days there is slow moving traffic through both sets of lights. Adding to this volume would make West Vale virtually impassable at peak times. Another concern is services and amenities. The local schools are already at capacity as are the doctor and dental surgeries and would not cope with the demand from extra patients or students.

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

Duty to Co-operate Reason:

little or no information about the proposals

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609726>

Comment ID **HRU1125**

Site ref (if applicable): **LP1625**

Person ID: **1243884**

Name: **Mr Andrew Zoledziejewski**

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 am writing to object to the proposed plan to build on the following sites: "ç LP0592 (New gate farm) "ç LP1625 (Silverdale terrace) "ç LP0177 (Ellistones place) "ç LP0026 (Gate farm). GREENBELT. These areas are a natural soak and any removal of the floodplain in any capacity would be catastrophic further into West Vale, Elland and Brighouse if this was to disappear the significant loss of greenbelt is extremely worrying. These plots are in a semi rural location and any loss of this greenbelt would create urban sprawl and an extreme lack of green spaces for recreation and not to mention habitats for local wildlife. INFRASTRUCTURE. With Greetland already upto what many would say call full capacity anyway, I have no hesitation in saying that I any of the proposed sites are used for housing development this will be a complete failure in planning, location and the necessary need for houses in any capacity. The schools are already full, the local doctor surgeries waiting times can't count cope with the demand for local area present. Traffic is utter chaos in West Vale, which is an area which cannot be avoided to get to any of the areas in the local Ward. Throw another estimated 1200 cars into the mix if the proposed 600 homes do go ahead and is simply will not work, its barely passable at peak times at present. DISPROPORTION OF HOUSING SITES. The sheer scale and disproportion of the number of homes to build on a single stretch of road is shocking. Why has such a large amount earmarked for such a concentrated area and Greenbelt area

at that, when the Ward consists of greetland elland stainland and holywell green. We're supposed to be promoting development on Brownfield first yet in calderdale as a whole you're telling me that every single area of Brownfield has been exhausted and this is the only viable solution. I find that very hard to believe. I understand the need for housing development to be built at this time that I urge you to remove these 4 sites. As time goes on even without the housing development going ahead there is a significant increase in cars on a road. More extreme weather conditions which test our floodplains on a more regular basis. I really think you should reconsider as this will only be made worse and a scale I cant even imagine as the scenes of devastation from the floods on a few weeks ago in west vale and elland alone were beyond belief. When these Greenfield areas go they dont come back and a functional Greenbelt at that, which is what these 4 sites mention are. Please find enclosed photos of evidence of the flooding which occurred on the 09/02/20. And the need to preserve these natural soak always and floodplains. THE GOVERNMENT. The Government attaches great importance to greenbelt, the fundamental aim of greenbelt policy is to prevent urban sprawl by keeping land permanently open. Green Belt serves 5 purposes: a) to check the unrestricted sprawl of large built up area. \*\*\*this local plan merges greetland into surrounding areas. b) to prevent neighbouring towns merging into one another. c) to assist in safeguarding the countryside from encroachment. \*\*\*the local plans 600 proposed homes in semi rural locations which provide habitats for local wildlife. d) to preserve the setting and special character of historic towns. e) assist in urban regeneration, by encouraging the recycling of derelict and other urban land. \*\*\*not all brownfield has been exhausted in calderdale, not even close. Brownfield site just half a mile down the road in west vale, and former Hanson brickworks in elland yet they decide to build on a green belt floodplain.

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

Duty to Co-operate Reason:

Little or no information on proposals.

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609730>

Comment ID **HRU113**

Site ref (if applicable): **LP1625**

Person ID: **1241695**

Name: **Mr John Fox**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Insufficient consideration has been given to guidance on flooding risks and transport issues.

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

Sound Reason:

The mitigations will be inadequate to overcome the constraints identified. Flooding and traffic congestion issues are significant.

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

Duty to Co-operate Reason:

Suggested Modifications:

The best modification is the removal of the site from the plan.

Comments:

Additional Evidence Link:

Comment ID **HRU1136**

Site ref (if applicable): **LP1625**

Person ID: **956333**

Name: **Mr Michael Chantler-Dobson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The Calderdale Local Plan for the proposed development within Greetland as listed is not legally compliant. Please refer to the details below relating to Government policy and framework relating to any proposed development on any listed greenbelt land or areas that are identified as flood plains or adding to flooding risk.

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

Sound Reason:

Flooding Chapter 14, paragraph 163 of the NPPF says: -“when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere” Calderdale Council has failed to comply with policies on flood risk management. and environmental issues have been ignored by this Council. Under question is the Calderdale Council's Sustainability Appraisal process that supports the release of these development sites within Greetland and the further impact on flooding in these areas plus adding to the increased risk further into the River Calder from Greetland to Elland. Military support has been called into Calderdale on Saturday 15 th February 2020 whilst we brace ourselves for the onslaught of Storm Dennis and following the risk to life and devastation of the floods created by Storm Ciara last weekend. The impact on the Calder Valley and the actual effects on all of these development sites and subsequent changes to the landscape from this proposed development will add to further flooding and risk to life. The local and national news is covering the huge flood impact on our local community in Calderdale. Huddersfield Examiner Website Headline Story February 15 th 2020: -“Storm Denis Flood Fears In Calderdale, Prompts Army Response to Protect homes” | “Yorkshire Post Website February 15 th 2020 - “Armed Forces Arrive In Calderdale to SUPPORT flood response and Storm Dennis preparations” | The Belfast Telegraph February 15 th 2020: -“Army to Help - “Exhausted” Flood-Hit Residents in Yorkshire” (all relating to Calderdale) I again refer to the NPPF (paragraph 95) and highlight POLICY surround development proposals that could impact and adversely effect public safety and security and that of our defence: 'Planning policies and decisions should promote public safety and take into account wider security and defence requirements by: a) anticipating and addressing possible malicious threats and natural hazards... This includes appropriate and proportionate steps that can be taken to reduce



vulnerability, increase resilience and ensure public safety and security; and b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.' Clearly these proposed sites that flood regularly would be far more at risk due to the development within Greetland. The proposed development will change the natural ability for the land to direct and dissipate run-off water in, not extreme weather conditions, but in what we are now seeing as 'normal' challenging weather. Community The development will have a negative impact on the community. The entire Greetland area and greenbelt that is part of this proposed development would destroy a well-used piece of countryside that is enjoyed by a large majority of the local community. From the NPPF, it clearly says "To protect and enhance biodiversity and geodiversity, plans should: a) identify, map and safeguard components of local wild-life rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity" Clearly this development is at odds with this directive as it would damage local wildlife altering and negatively impacting biodiversity as well as habitats and the landscape. Alternative land in Stainland has been previously removed from the Calderdale Local Plan. This land in Stainland would have avoided all such negative impacts. Therefore, the Calderdale Local Plan and the local planning authority have failed to adhere to this legislative policy. Infrastructure The entire proposed development in Greetland under the Calderdale Local Plan of approximately 600 homes is simply unsustainable from a physical infrastructure perspective. The local schools are full, the local GP surgery is under massive pressure and the road infrastructure cannot cope with current traffic levels. The pressure on the traffic light controlled junctions within West Vale, with traffic feeding from Saddleworth Road, Stainland Road and Rochdale Road, is unsustainable and the aforementioned road structure is almost not fit for purpose with current traffic levels. When there are any issues on the M62 between junction 22 and 24 (fairly frequently) then these routes become completely gridlocked. An extra estimated 1200 cars just feeding into this from the Greetland sites as proposed with the Calderdale Plan will not only add increased congestion issues but also have a bigger impact on the environment and also increase the risk to pedestrian safety and wellbeing.

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

Duty to Co-operate Reason:

Given that the plan is in breach of the NPPF Policy, then if the "Duty to Co-operate" is a negative action by Calderdale Council, the Planning Department and the Calderdale Local plan, then "No" the plan does not comply. However, I feel this is such an ambiguous question that feels set out to intimidate and confuse local people and try to avoid objections. Might I also add that the lack of knowledge and communication to local residents about this "re-submission" of these lands within Greetland is not acceptable and should form a basis of an independent enquiry. The fact that a local group of residents has created a pressure group on social media, been featured on Regional TV News, been featured in Local Press and has organised protests at the Halifax Town Hall and on the greenbelt in question, shows that feelings are very strong about protecting this land and making sure the environment and infrastructure in Greetland is not negatively impacted by this misplaced development proposal. It should also be noted that the fact these sites in "Greetland" are listed as "Elland" means their visibility when searching for them as "Greetland" causes further confusion and exclusion for some parts of the community. The way in which this has been handled clearly discriminates against parts of our community. Also, this actual website search function when using the LP reference numbers does not work either. So when you do complete the arduous task of registering and then you assume a 'reference number search' will get you to the right place, and it does not, you start to question the wider motivation that might exist by making this objection and consultation process as difficult as it is.

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1141**

Site ref (if applicable):

Person ID: **1243493**

Name: **Mr Andrew Cooley**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I have submitted these same comments to each of these sites which are all in the same geographic area: - LP0026 - LP0177 - LP0952 - LP1625 In my opinion it would have been better to list all of these sites as one; this would avoid duplicating the same concerns. \*\* Compliance Building on flood plains and green belt land is not part of government policy, as mentioned in NPPF and PPG. The land to be built on is always sodden, even in summer; if covered with tarmac and concrete then this ground water will be forced downstream causing problems, not only locally, but further afield in West Vale and Elland. The impact on local wildlife will be dramatic; herons, kingfishers and deer are amongst the large variety of wildlife seen in this area. It will affect local residents who will no longer be able to enjoy the tranquil, natural countryside for which this area is locally renowned.

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

Sound Reason:

\*\* Soundness I do not believe the plan is positively prepared since local infrastructure, including local roads, health care and schools will not cope well with the increased population in the local area. Traffic will be especially affected since the majority of new journeys will all be on and around Saddleworth Road. It is likely new residents will commute to work at peak times, which already suffer heavy congestion especially in West Vale. It is likely Scar Bottom Lane and Brian Royd Lane will see an increase in traffic. These roads form a part of a bus route which is a single carriageway. The bus is often caught in this bottleneck and increasing levels of traffic will only make this more likely for all road users. This increase in local traffic will affect air quality, which is especially important because schools are situated next to the main roads; this contravenes the government's policy on air quality. I do not believe the plan is justified since building on green belt and flood plains should only be a plan of last resort, and alternative brown field sites are available in both the local and wider areas. \*\* Effective There is a disproportionate amount of development outlined for Greetland, especially when it is has been listed as part of Elland. The area to the north of Saddleworth Road has already undergone significant development in recent decades, including Templar's Close, Daleside and Trenance Gardens. To further develop the south side of Saddleworth Road is unjustified and would lead to a disproportionate amount of new housing in the valley. At the last census Greetland had a population of 11,389. Adding 600 new homes could increase this figure by around 15-20%. Increasing the size of a village in a very short time scale is neither practical nor an effective means of providing sustainable development. \*\* National Policy Building on the flood plains and green belt land contravene government policy.

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

Duty to Co-operate Reason:

I have had no formal communication from the council regarding these plans, nor have I seen any publicly posted notices.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID

**HRU1145**

Site ref (if applicable):

Person ID: **1243894**

Name: **mr Justin Hirst**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

In my opinion the Council have failed to meet its three core principals of Community Involvement namely, Clarity, Inclusivity and Integrity. If it was not for the support of the local community many people would be unaware that the sites have been put back into the Local Plan and that a further consultation period has been made. Exactly what is expected of the general public is also unclear. Phrases such -“Is this Sound” have very little meaning to general public. The use of acronyms, legal and planning -“jargon” make the plan far from user friendly. I do not know how the -“average lay person” can be expected to form a clear and sound argument. With this in mind I would say that the plan is not at all -“inclusive” and as such would exclude a number of people from being able to express their opinions. The Local Plan Website is extremely challenging to navigate, even for the most computer literate. The Council are showing very little Integrity, with local Councillors and the community not being kept up to date with what is happening. The council has also failed to listen to the community in compiling the plan. Residents were asked to comment on the removal of this site (LP1625) from the Green Belt in 2015 and then on its inclusion in the Local Plan in 2017 . In both instances the overwhelming response from the community was that the land should not be in the Local Plan and should remain within the Green Belt. The sites in Greetland got the highest number of comments compared to the rest of Calderdale. Despite this, the Council, after initially removing the site, has now put it back into the Local Plan with no sound reasoning to support its actions. In addition, concern has been expressed by residents, as to why Greetland has been classified as part of Elland. Greetland is completely separate from Elland and it is misleading for the two areas to suddenly be -“consolidated” Residents of Greetland, on reviewing the Local Plan would have no reason to -“look under” Elland and would miss the opportunity to put forth their comments. Within the -“Settlement Hierarchy” the villages of Greetland/West Vale are not even listed, but the villages at either end of the Greetland (Holywell Green and Barkisland) are listed as Neighbourhood/Small rural areas. In connection with this, there are also questions as to true increase in the amount of housing stock for the Greetland area. In the Councils calculation for -“Distribution of House Growth” Table 3 Infrastructure Delivery Plan 2019) it shows Greetland, along with Elland, Holywell Green & Stainland to have a growth of 8.21%. However, if Greetland and West Vale are viewed on their own ; which they should be ; using the latest Polling District Figures, the increase in housing stock is around 20%. This is too much for a village of this size and with such limited infrastructure. The Council also appear to have -“gone against” a number of policies set out in the National Policy Planning Framework such as: When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the

Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. The council have not demonstrated that development of this Green Belt will outweigh the harm. The Council have simply created a vague list of possible ways to -“mitigate” problems, most of which have no concrete or sound basis and in some cases are just totally incorrect. When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. The land proposed for development is used as a natural storage area which controls the amount of water going down to Black Brook and ultimately helps prevent even more flooding down the valley. In addition, the targeting of non Labour wards (both Liberal & Conservative) within Calderdale, whilst not illegal, is highly suspect at worst.

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

Sound Reason:

**LOSS OF GREEN BELT** The site is currently designated as being in an area of Green Belt and in a recent survey it was seen to perform well in 3-5 areas. This area of Green Belt is also classified as being highly sensitive. In 2018 the Council deemed that this area of land was of such significantly high importance that it should be removed from the local Plan and yet now feels that the land is suitable for development. The council have not demonstrated any sound reason for this reversal, other than more land is required. The council have also failed produce any evidence, to show that all available Brownfield sites have been exhausted. Indeed, when challenged, they seem unable to produce any current information with regards to Brownfield availability. Their requirement to maintain a Brownfield site register with an annual update has failed (last update was 2018) so it is impossible to see what brownfield sites exist as potential alternatives. Removal of this Green Belt land could, set the precedence for removing even more of the land from the Green Belt and for development to take place all along the valley. Any development of this Green Belt area would have a major impact on the landscape and dramatically change the character of the locality forever. If Calderdale have determined that Greenbelt land of significantly high importance is now building land, then all land in Calderdale, Greenbelt, Sites of Special Scientific Interest, flood plains should also now be considered as building land. The development of this area would also mean a considerable loss of Open Space. The Council have stated in their report that removal of this land would have -“no loss/no impact” on the area. There seems to be no consideration that taking the Saddleworth Road Development as a whole, would mean a loss of nearly 25 hectares of open Green space which would have a detrimental effect on the local community. The area is regularly used by walkers, cyclists, horse riders and families. The area is becoming even more popular due to a number of initiatives by the owners of the industrial plant. The site has a public right of way to the west of it. Whilst the developers have stated that this will be retained, it does not take into account what effect the development would have on the character and tranquillity of this area. Walking through a housing estate is not the same as walking through untouched green belt fields. **FLOODING** The fields within this site all provide land for the run off from the Moorland at the top of the valley. This is clearly demonstrated when we have heavy rain fall. Building on top of this natural soak away would leave nowhere for the rainfall to collect. Whilst the developers may well be able to drain the sites successfully there appears to be not account taken of where that water will then go and what potential that has for flooding elsewhere in the valley. Given the recent catastrophic flooding the area experienced on February 9 th this year ; the second time in less than 4years, greater care needs to be paid to the building on flood plains and natural soak always. **ENVIRONMENTAL HEALTH** The creation of so many houses is going to have a large impact on the amount of pollution created. The development, across all the sites on Saddleworth road, has the protentional to add over 1000 cars to the road (@ 600 houses and 2 per household). Currently pollution figures are not collected for Saddleworth Road due to -“its open nature” allowing pollution to disperse. However, this natural -“escape route” will be eroded if this considerable area of land is developed. Currently traffic can be cued nearly half a mile up Saddleworth Road waiting to get through the traffic lights in West Vale. The possibility of an increase in cars will mean

more cars on the roads, with more engines idling and pumping out more pollution. This is particularly worrying due to the local infant school being next to the road. In the event of closure of the M62 between the junctions for Rishworth and Huddersfield, Saddleworth Road is one of the designated diversions. Traffic regularly cues back over a mile from the Stainland Road / Saddleworth Road junction in these instances. Monthly Pollution readings for West Vale obtained from 2019 Air Quality Annual Status Report show that these monthly readings regularly exceed the 40mg/ limit, which has been set by the Council. More traffic will only increase these numbers which will be against their own targets. INFRASTRUCTURE The MP for Calderdale, Craig Whittaker, has already expressed his concern regarding the "lack of a robust Infrastructure Plan" and how this will have a negative impact on the plan. The Infrastructure plan has no concrete solutions and does not address the many problems this development would bring such as lack of school places, both infant/junior and secondary, no NHS dentists and the pressure it will put on the local GP practice, to name but a few. The local school is unusual in that it split over two sites which are approximately half a mile apart. The intake is based on the proximity to the school site on Saddleworth Road. With the increase in housing on this road it could potentially mean that children living next to the School on Rochdale road could not secure a place. Potentially it could mean parents having to drive their children to schools away from the village thus adding to the congestion and pollution. In addition, other infant / junior schools in the area, West Vale / Holywell Green / Norland / Bowling Green are all either very close to or at capacity in all year groups from Reception to Year 6. Further afield, Elland / Lindley (in neighbouring Kirklees) are all at capacity. The public transport is very limited, buses to Halifax run once every hour, do not operate in an evening and have limited service at a weekend. The buses frequently miss and consequently you are unable to rely on them as a means of commuting to work. The main concern though is how the increase in traffic will impact on the area and the lack of any foresight as to what impact this have. The Site Report states that - "Mitigation measures are likely to be required at the Stainland and Saddleworth Road Junction" however it does not detail what the - "mitigation" will be. The Stainland Road / Saddleworth Road junction is very close to a second junction (less than 200 mtrs) for Rochdale Road / Stainland Road ; the existing problems at rush hour (morning and night) have been ongoing for many years and have been getting worse over the last 5 years. This is despite repeated - "mitigation measures" attempted by Calderdale council. These do not work. In fact a decision to allow the building of a Co-Operative store (with car park) which has an entrance on the junction, causes significant problems / near miss accidents. All major services run through the junction road surface (Gas / Water / electric). At times of major engineering work, the whole Stainland Road / Saddleworth Road junction is placed under 4 or now 5 way traffic control. It takes 30 minutes to travel less than 500 mtrs. It is also worthwhile noting that the M62 has just undergone extensive works to make it a - "smart motorway" which should help reduce congestion. However further schemes to convert areas to - "smart motorways" is now on hold pending Government review into its safety. Using the Sustainability Appraisal Report it can be seen that this site has 11 uncertain impacts, 1 negative and only 4 positives. When read in detail I would even question the validity of some of these - "positive" impacts and suggest they are more suited to uncertain or even negative. Given the amount of uncertain and negative points raised, I would question the validity of recommending this site as a suitable and sustainable area for development. Whilst we have been told that each site must have a separate and different submission, it has been nearly impossible to do this as each area of land is so interlinked. Indeed, to consider each site in isolation is not taking into account the full impact which developing over 24 hectares, with nearly 600 houses, will have on our local community and the environment.

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

Duty to Co-operate Reason:

residents not written to, everything is on the website. excludes vulnerable older residents with no internet.

Suggested Modifications:

remove from plan. FORCE developers to develop ALL brownfield first. regardless of their "we won't make ENOUGH money on it. who cares what their balance sheet likes. you are the council. or are you in the pocket of the developers and taking back handers?

Comments:

Additional Evidence Link:

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Comment ID **HRU117**

Site ref (if applicable): **LP1625**

Person ID: **1239034**

Name: **Mr Stephen Walker**

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:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5594671>

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Comment ID **HRU1190**

Site ref (if applicable):

Person ID: **1243922**

Name: **Mrs Julie Wollin**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I don't feel qualified to comment on the legality of the plan.

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

Sound Reason:

Main points of objection: Air pollution and traffic Our roads are already at capacity and would not be able

to cope with increased traffic. The journey into Halifax should take 10 minutes but at peak times it can take up to 45 minutes. Any increase in traffic will also cause a significant increase to air pollution. Loss of greenbelt and impact on wildlife corridor Greenbelt should be protected. It is used and enjoyed by walking groups, individuals and children and beneficial to everyone's mental health. If the plans being proposed are given the go ahead then the wildlife in our village would be decimated and we would lose the opportunity to enjoy seeing all the various birds, bats and hedgehogs that currently live in Greetland. Infrastructure Greetland is a village not a town. The size of the proposed development is disproportionate to the size of the village. Doctors, dentists, hospitals and schools are already under strain and would not be able to cope with the addition of 600 plus households.

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

Duty to Co-operate Reason:

I don't feel qualified to comment.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1195**

Site ref (if applicable):

Person ID: **1241581**

Name: **Mrs Michelle Audis**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The development plan involves building on areas of green belt and green field, these areas should be kept and preserved for future generations. We should not have to lose our areas of natural beauty for people to make a profit. To build on these areas will simply take away our natural areas, our outdoor areas and impact negatively on wellbeing and mental health.

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

Sound Reason:

The areas for housing seem to sit within the Greetland area, there are no houses planned for the Stainland area. The impact that building these houses will impact on the local community for years to come. This is not a right here and now issue, this will be detrimental to the community and environment for years and years to come. Problems such as higher water, air and noise pollution, increased traffic, more fatalities, increased car dependency and dependency on roads and public transport that are already insufficient. Traffic congestion is getting worse and worse, on both Rochdale and Saddleworth roads. There is no way of making this better for current residents so building 600 houses is simply going to make this worse. Air pollution will affect residents massively. By increasing the number of cars and the number of car journeys, this is simply going to make a problem even worse. The schools and local Surgeries are already full, the sewers are already flooding. The areas around the four sites is Grade 3 agricultural land which, by Calderdale's own recognition, is an important commodity in light of climate change. The Woodland Trust

has just supported the donation of over 100 trees that are recommended for this area. The fields have natural springs which run through the sites. By digging these up, in order to build houses, there won't be anywhere for this running water to run through, hence making the area a flood risk. In light of the recent storms, we have all witnessed what can happen when there is nowhere for the water to soak into. Green areas and natural areas are important to the mental health and physical wellbeing of residents. The proposed urban sprawl will impact negatively on residents, taking away areas of natural beauty.

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

Duty to Co-operate Reason:

The lack of effort by Calderdale council to make residents aware of the plan is astonishing. I only found out about the plan through social media and parents at school. The council website is not fit for purpose, it is hard to navigate around and seems to make things more difficult than they really need to be in order to make objections. There have been times when the website has crashed, not saved or simply frozen when I have been trying to make my objections.

Suggested Modifications:

The four sites LP0026, LP0952, LP0177, LP1625 to be removed from the plan.

Comments:

Additional Evidence Link:

Comment ID **HRU1200**

Site ref (if applicable):

Person ID: **1243910**

Name: **Mrs Diane Taylor**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

My understanding was that land was only to be removed from Greenbelt land in exceptional circumstances. There are no exceptional circumstances when there are undeveloped Brownfield sites in the area. I refer to the NPPF para 177 and the associated PPG in the sustainability of Greenbelt land.

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

Sound Reason:

Wildlife - To lose the greenbelt in this area would be extremely detrimental to the wild animals in the area. Once this land is gone it is gone forever. I often witness many species of wildlife including deer, bats, newts, hedgehogs, woodpeckers, foxes and owls. No mitigation can prevent the impact of urban sprawl and destroy their natural habitat. Loss of greenbelt - This land is precious to this community and the wider community from a visual, physical and emotional perspective. It is fundamental for our lifestyle to be in touch with nature to support both mental and physical health. We need areas like these that are free and easy to access. Living directly opposite this site you realise how many people stop to photograph the view and have their lunch whilst enjoying its beauty. The community walk the paths along the river. Having somewhere away from noise, cars and pollution is crucial for our wellbeing. To take away these footpaths and open spaces is to deny our young people the opportunity to enjoy the countryside and open air in a



safe environment. Infrastructure ; The sewer system is at capacity already. Greetland may have sufficient school places to meet the needs of the existing community but it certainly doesn't for 600 more families. The schools in this area are Academies and can't be forced to expand, this would mean parents using their cars to transport their children to school. The roads into West Vale are already unable to cope with the volume of traffic. All doctors and dentists are full. I have been living in Greetland for 11 years and travel to Ripponden to the doctors and have only just received a place at the dentist in West Vale in December. Air Pollution ; West Vale and Ripponden are already unable to cope with the volume of traffic during rush hours. Saddleworth Road outside the KS1 site of the Greetland Academy is an accident waiting to happen. Cars are double parked from the Nursing Home all the way up past Sunnybank Drive. The volume and speed the HGV travel up and down Saddleworth Road to the Sonoco factory and Bosch factory is already a high risk to children walking to and from school. More traffic on these roads would not only increase the risk of accidents but also the increase in air pollution would cause a serious health risk to the children both walking to school and those already at school playing in the grounds. The increase in air pollution ignores the recommendations of PHE. Children aren't just walking to Greetland school down Saddleworth Road but children walk to Brooksbank High School, the children are all walking where there will be a constant que of vehicles, where the pollution would be harmfully concentrated. Flooding ; Sites LP0026, LP177, LP953 and LP0952 are so close in proximity that they can't be viewed as individual sites as the overall impact of the local plan would be catastrophic to Greetland as a whole. The land LP1625 doesn't flood to the extent the other sites do however this site soaks up a huge amount of water, water that would go down stream if this land was built on and cause detrimental effects on existing housing in Greetland and have serious downstream effects in West Vale. The land in Greetland is full of natural springs, we have a pump in our back garden due to the amount of water coming through the land. If we didn't have this our garage would be flooded most of the year.

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

Duty to Co-operate Reason:

I have had no contact from the local council regarding the considered development. The plans are not current and not compliant. Economic growth needs to be reviewed and a new plan developed in line with the changes.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1225**

Site ref (if applicable): **LP1625**

Person ID: **1243919**

Name: **Mrs Sara Cooley**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Building on flood plains and green belt land is not part of government policy as shown in the NPPF and PPG. The land in this proposed site is always sodden, even in the height of summertime. It is unthinkable to imagine the impact that covering this natural soakaway with tarmac & concrete will have. The recent

Storm Ciara left the fields full of water as huge amounts of rain ran down the hill towards Black Brook. The current houses on Woodfield Drive narrowly escaped flooding inside their homes. Without the natural soakaway, these houses will almost certainly flood. The impact will be felt further downstream in West Vale, Elland and onto Brighouse. The impact on wildlife will be dramatic. Herons, kingfishers, deer, badgers & bats are amongst many species who call the trees & fields around Black Brook their home. There is no doubt that many of the animals will leave their homes here permanently due to the disruption caused by construction of new houses. The proposed development will also affect local residents who will no longer be able to enjoy the tranquil, natural countryside on our doorsteps which is one of the reasons many people choose to live here.

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

Sound Reason:

POSITIVELY PREPARED I do not believe the plan is positively prepared since local infrastructure, including but not limited to, schools, health care & local roads will be able to cope with the increased population in the local area. All local schools are currently running at full capacity and there is no consideration in the plan to extend current schools or build new ones. Traffic will be especially affected since the majority of journeys will be on or around Saddleworth Road. There are few employment opportunities available with walking distance of the proposed development so new residents will need to commute at peak time adding to the already gridlocked traffic in West Vale. This would mitigate the future gains made by the improvements to the A629. Saddleworth Road is also used by many large lorries travelling to and from the Sonoco Recycling plant, local quarries & Bosch factory among others. More traffic would impact these businesses. Public transport is very limited in the area with only 1 bus per hour between Halifax & Huddersfield in each direction. This is not enough to tempt people out of their cars for commuting. The increased in traffic, particularly gridlocked traffic, will negatively affect air quality. This is especially important as the local infant & junior schools are situated next to main roads. This contravenes government policy on air quality. This also contravenes Calderdale Council's commitment to preventing climate change. EFFECTIVE There is a disproportionate amount of development proposed for Greetland. At the last census Greetland had a population of 11,389 which means that, should all the proposed sites be added to the local plan, the population of Greetland will increase by at least 15-20% in a short space of time which is neither practical nor an effective way to provide sustainable development. Greetland has already undergone significant development in recent decades with the developments of Templars Close, Daleside, Trenance Gardens, High Meadows & Bankfield Grange to name a few. With each development residents see a change to the water courses down the valley. A development on the scale of that proposed here could be catastrophic for many residents locally and further afield in West Vale, Elland & Brighouse. NATIONAL POLICY As stated previously, building on flood plains and green belt land contravenes government policy.

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

Duty to Co-operate Reason:

I have had no formal communication from the council regarding these changes to the agreed Local Plan. Neither have I seen any publicly posted notices with the exception of posts from Calderdale Council on Facebook. I am concerned that there are many residents who are unaware of these proposed changes to the agreed local plan.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1229**

Site ref (if applicable): **LP1625**

Person ID: **1243929**

Name: **Mrs Rachel Taylor**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

This is greenbelt. The Local Plan does not address the implications of the National Planning Policy Framework, especially, NPPF Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. According to the NPPF Para 143 under 'Proposals affecting the Green Belt' it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' The very special circumstances are non existent in this site.

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

Sound Reason:

Greenbelt The greenbelt land in Greetland is classed as highly sensitive on the Local Plan and has been designated as a -" wildlife corridor "It is important to all and used by many. There are fields leading down to the Black Brook where wildlife (some of it protected) including deer, badgers, herons, barn owls, woodpeckers, king fishers and bats thrive. The river, trees and farmland provide amongst other activities space for family walks, cyclists, dog walkers, nature rambles by local children. Surely we do not want to lose this space? All of this would be lost should the 600+ properties be built on the green belt land identified. The revisions to the plan (i.e. the addition of the new sites) proves further unsustainable development with a disproportionate amount of new homes proposed across four sites in Greetland with 1,041 additional units of the 1,708 on new housing sites (over 60%) proposed in the Elland area. There are previous plans for a greenway to be extended along the wildlife corridor so that more residents can take advantage of the nature offered by Greetland. Let's do this! I also refer to the National Planning Policy Framework (NPPF) Feb 2019 para 137, point c which covers that building on greenbelt should only be considered in exceptional circumstances. I ask -"Has brown field development in this area really been exhausted?"Can we not re-utilise these sites ahead of greenbelt (for example the plot where a mill has been demolished at West Vale). There would be an increase in noise and light pollution spoiling the rural aspect of our village. Air Pollution The Clean Air Strategy 2018 quotes that while we do need to ensure economic growth, we also need to realise the cost of air pollution on health. The recent research commissioned by Public Health England shows that air pollution affects the population by increasing health and welfare costs by up to £18.6bn by 2035. It is found that the single biggest air polluter is traffic. Such building along Saddleworth Road would lead to an increase in the traffic heading through West Vale traffic lights. Calderdale Council are aware that the traffic volume at West Vale is already at 117% with daily queues already leading back from the traffic lights up as far as the school. Surely the traffic fumes and sheer volume of more impatient drivers is a risk to the safety, health and wellbeing of the 4-7 year olds who attend the Sunny Bank Annex of Greetland School? We are already waiting for an accident to happen here or from increased volume of traffic further through West Vale at the West Vale School. Flood Plain Do we really want to build on this land which has proved in the past to be subject to flooding from the Black Brook? Calderdale have declared climate emergency! I attach my photograph to show the recent flooding effect on this plot. It seems irresponsible to build here when such flooding would lead to insurance being unavailable followed by questions around why Calderdale Council allowed building here. -"I understand that Councils are stuck between the Government demands for housebuilding and the difficulties of

identifying suitable sites however I urge you to look at the planning policy and the relationship between housing numbers and the pressure of flooding" Cllr Swift. The current village of Greetland is built on a hillside and there are hundreds of springs which appear after heavy rain throughout the year. These springs have increased in volume and quantity since earlier building projects in the Greetland area. All of this excess water heads down through the areas identified for building on their way to the Black Brook. With buildings in the way there will be huge impact both locally and further downstream at Elland Bridge. The water has nowhere else to go! Diverting these springs leads to flooding of land which has not been flooded before. According to [www.environmentlaw.co.uk](http://www.environmentlaw.co.uk) the wide scale flooding incidents in the UK and the threat of climate change, new developments in flood risk areas would only be allowed when it is exceptionally necessary and when it does not increase the risk of flooding in the developments, the community or elsewhere. We need to question the Council's Sustainability Appraisal process to support the release of the new sites with the site at 'Land adjacent Ellistones Place' (Ref: LP0177). This appears to be a completely unjustified recommendation. The site report states that the assessment of SA7 is 'Negative' and marked 'RED' commenting that "Overall the impact is negative as the site is greenfield and lies within flood zones 2 and 3". Based on this information this site should be excluded! Infrastructure School ; The Greetland School has some 400 pupils and is outstanding. We know why the land would seem a great prospect for these building plans. However the school is full ; it cannot take the extra children who would be in the proposed developments. It is also worth noting that the proposed housing would be the prime catchment area for the school so that children at the top end of the village, where the 7-11 year olds attend, would lose out on places at the school. This is despite the fact that para 94 of the NPPF states that it is -"important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive positive and collaborative approach to meeting this requirement" Doctors/dentists ; Again the facilities for the Greetland population are already at breaking point ; where is it planned that the extra population will be accommodated? Public Transport - Saddleworth Road buses are shockingly poor as it is. But be aware that putting on more buses will only increase the traffic situation around tight corners at West Vale. Sewers ; these are over flowing with Saddleworth Road and the surrounding roads which lead into Saddleworth Road are constantly being dug up to resolve leaks and blockages. Conclusion This all adds up to the fact that the proposed plan is not sustainable in NPPF terms. When the harm Identified is taken into account then the proposal do not amount to sustainable terms!

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

Duty to Co-operate Reason:

As a Greetland resident I can confirm that I have received nothing official from Calderdale Council regarding the development of the sites along Saddleworth Road. Thank goodness for Facebook.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1236**

Site ref (if applicable):

Person ID: **1243596**

Name: **Mr Stephen Smallburn**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

There was no further consultation prior to the sites being re introduced into the plan.

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

Sound Reason:

The plan is not sound due to the following reasons Access to and from the proposed site onto Saddleworth Road would be difficult due to the volume of traffic already using the road. Increase in housing will lead to an increase of traffic on Saddleworth Road, which in turn will lead to an increase in both air and noise pollution. The road is used as an alternative route into both Huddersfield and Halifax when there are problems on the M62. West Vale is currently struggling to cope with the volume of traffic further housing development would present insurmountable issues. Building on greenbelt will contribute to the urban sprawl that is working its way up from West Vale and if continued the villages of Greetland and Barkisland will lose their own identity.

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

Duty to Co-operate Reason:

The plan does not comply with the duty to cooperate as the plan was changed without consultation

Suggested Modifications:

All proposed sites on Saddleworth Road need to be removed from the plan.

Comments:

Additional Evidence Link:

Comment ID

**HRU1249**

Site ref (if applicable):

Person ID: **1243917**

Name: **mrs rachael illingworth**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Building up to 600 new homes in one village, along one road, increasing the village capacity of urban sprawl (1041 additional units overall in a village less than 3000 dwellings!) with no clear plan to mitigate the above issues defies any logic or common sense. The lack of thought, consideration and transparency of process provides no confidence the plans will be implemented with any degree of success. Therefore, as a family we strongly oppose any plans to build on all sites given the lack of infrastructure and impact on pollution and wildlife in the area, the disregard for history and heritage and the disproportionate impact of the houses being built on one main road in one village. I would also be very keen to understand the exceptional circumstances to justify building on greenbelt to this extent in one village with a number of brown belt sites left in derelict in this and other wards? There are currently 135 properties for sale on right move in HX4 alone with a number of friends having to rent their houses as unable to sell. Despite the lack of infrastructure, impact on wellbeing and quality of life of children, safety of the road and air pollution I can't

see how this plan is sound or legal and it does not conform to central government policy or current legislation with regards to building on flood risk areas. It also does not conform to any commitments the government has made on tackling air pollution and flooding in the area

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

Sound Reason:

Infrastructure Traffic - There's a significant issue with congestion along Saddleworth Road as it stands, particularly around West Vale junction where it often takes over 20 minutes just to get through 1 set of lights. Building any additional homes that will use this junction will just compound this existing issue. But building up to 600 homes along one road without significant infrastructure improvements will be detrimental to the area. It will also increase the number of cars heading up to and from the M62 motorway, already an extremely busy route with long wait times at peak times, putting people off moving to the area. The road is also used for many heavy vehicles such as large lorries and tractors (I would say 1 in 7 vehicles is a HGV) this is only going to get worse with planning permission for a HGV turning circle being agreed to send large vehicles away from Sowerby bridge and down Saddleworth road into Greetland. In an area which is high for families, has a school on the main road and is already heavily congested how can the council think adding any more traffic (never mind 600 houses worth) on one road is a logical decision. School ; Greetland (Sunnybank) is at full occupancy with some years over subscribed. Expansion of the school would be needed to support any additional homes or will existing and new residents be expected to move out of the area? There are no available plans on how this issue will be mitigated. It is also on the main road which given the traffic issues raised above gives major concern for air pollution for our children ; how will this be mitigated? Doctors ; Again, an element of our infrastructure that is already at breaking point, with significant wait times for appointments. Additional homes will further strain this and increase the traffic around the West Vale junctions. Safety The amount of traffic moving along Saddleworth Road at peak times currently presents a significant risk. This is particularly apparent at school pick up and drop off times. Just before Christmas my father had an accident whilst dropping both our children off for school. The sheer amount of traffic and the narrowing of lanes (due to parked cars and HGV's) results in someone reversing into his car and causing a serious head injury. Luckily the children weren't in the car at the time. More housing will cause more injuries and safety concerns. Land allocation It's difficult to understand from the information provided why Greetland has been categorised in with other local areas, i.e. Elland and Stainland, which when added together presents a misleading position of the area and the impact of so many additional homes. In addition, the only reason established (or communicated) for not focusing developments across a broader area of Brownfield sites is due to the additional costs to developers. This, in anyone's eyes, cannot be deemed 'exceptional circumstances' and the council clearly had not explored all other available options for development. Given the scale of the Calderdale area putting the majority of their housing plan across 2 close villages on green belt land says more about the politics between the different councillors representing different parties than it does about their planning capability. Wildlife We used to live in Leeds but moved to Greetland so our children could grow up in the countryside alongside wildlife. We often go for family walks along the wildlife corridor and see a vast number of animals such as deer, hedgehogs, beavers, owls, Heron and I have been told of a number of bats in the area. (just today my family spotted two deer running and jumping in the fields on this site) I just can't get my head around what exceptional circumstances with a vast number of derelict brown field sites unsupported would allow the vast development proposed along this precious wildlife corridor on green belt land ; notwithstanding the years of disruption and noise the building at this scale would pose to the wildlife and the children at the local school. I would seriously question the mitigating risk of this in the plans and the extent to which the real level of wildlife in the area has been captured. Flooding Development along Saddleworth Road will result in surface run off, impacting the entire area. Greetland already suffers from flooding across this proposed site. These fields act as a natural flood defence and housing development will surely increase the problem and create more flooding in the West Vale area. It is not small scale as recently demonstrated

when the water ran down and flooded a number of properties and commercial outlets in west vale. The water was so strong a shipping container was removed from a west vale rugby club causing damage to a bridge in Ellend. With the current government commitments and the complex nature of the springs leading down the fields in Greetland how can turning these vast fields into concrete support and prevent the flooding which is regularly seen. The small area of land marked as flood plane already regularly goes into residents gardens, many roads all the way along from saddlewprth road are often more like streams with Gate house land and other areas being prone to flooding. The NPPF states no development is to be permitted on land that is liable to flood. With millions of tax payers money being spent on flood defences in the area which still don't prevent flooding how can any of this land be classed as not liable to flood (lots of photographic evidence over the years and this year of this across all 4 proposed sites) How can the prime minister commit to stop building in areas of high probability of flooding when the majority of Calderdale housing plan is in an area which regularly floods? The mitigation comments on the plans show a real lack of understanding and wider impact of the area

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

Duty to Co-operate Reason:

Compliance / Lack of Transparency Calderdale council have failed to make Greetland residents aware of these plans, timescales, and the need to submit objections following recent changes and re introduction of land. The whole process lacks transparency and seems underhand. The fact the section along one stretch of road has been split into 4 areas, the complexity of the submission page and where to find the plots given they have classed under a different village name (Elland) which Greetland has never been linked to. Also from the start there was a lot of talk that this is a done deal from people who knew people who worked at the council and local farmers who's land will be sold. When objections have been submitted they have been changed or vastly delays going on the system so no one can read them. My 72 year old mother in law cried the other day after trying to object at how complex the whole system is and how her and her friend at the church and other high numbers of elderly on the area felt they were letting the community down with how complex and unsupported the process is

Suggested Modifications:

Brownfield sites should be considered before extensive development on green field sites. Looking through the total housing plan it seems excessive to be putting a vast majority of the houses in one village on valuable green belt and I am really surprised the councilors have voted for this with the current flooding and infrastructure issues in the area. This land in questions in home to a lot of wildlife which is regularly spotted which this obscene level of disruption feels unnecessary and disriportunate and appears to be more of a lazy choice than exceptional circumstances

Comments:

Additional Evidence Link:

Comment ID **HRU1265**

Site ref (if applicable):

Person ID: **1243917**

Name: **mrs rachael illingworth**

Organisation:

Agent ID:

Name:

Organisation:

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

#### Legal Compliance Reason:

Building up to 600 new homes in one village, along one road, increasing the village capacity of urban sprawl (1041 additional units overall in a village less than 3000 dwellings!) with no clear plan to mitigate the above issues defies any logic or common sense. The lack of thought, consideration and transparency of process provides no confidence the plans will be implemented with any degree of success. Therefore, as a family we strongly oppose any plans to build on all sites given the lack of infrastructure and impact on pollution and wildlife in the area, the disregard for history and heritage and the disproportionate impact of the houses being built on one main road in one village. I would also be very keen to understand the exceptional circumstances to justify building on greenbelt to this extent in one village with a number of brown belt sites left in derelict in this and other wards? There are currently 135 properties for sale on right move in HX4 alone with a number of friends having to rent their houses as unable to sell. Despite the lack of infrastructure, impact on wellbeing and quality of life of children, safety of the road and air pollution I can't see how this plan is sound or legal and it does not conform to central government policy or current legislation with regards to building on flood risk areas. It also does not conform to any commitments the government has made on tackling air pollution and flooding in the area.

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

#### Sound Reason:

**Infrastructure Traffic** - There's a significant issue with congestion along Saddleworth Road as it stands, particularly around West Vale junction where it often takes over 20 minutes just to get through 1 set of lights. Building any additional homes that will use this junction will just compound this existing issue. But building up to 600 homes along one road without significant infrastructure improvements will be detrimental to the area. It will also increase the number of cars heading up to and from the M62 motorway, already an extremely busy route with long wait times at peak times, putting people off moving to the area. The road is also used for many heavy vehicles such as large lorries and tractors (I would say 1 in 7 vehicles is a HGV) this is only going to get worse with planning permission for a HGV turning circle being agreed to send large vehicles away from Sowerby bridge and down Saddleworth road into Greetland. In an area which is high for families, has a school on the main road and is already heavily congested how can the council think adding any more traffic (never mind 600 houses worth) on one road is a logical decision?

**School ; Greetland (Sunnybank)** is at full occupancy with some years over subscribed. Expansion of the school would be needed to support any additional homes or will existing and new residents be expected to move out of the area? There are no available plans on how this issue will be mitigated. It is also on the main road which given the traffic issues raised above gives major concern for air pollution for our children ; how will this be mitigated?

**Doctors ;** Again, an element of our infrastructure that is already at breaking point, with significant wait times for appointments. Additional homes will further strain this and increase the traffic around the West Vale junctions.

**Safety** The amount of traffic moving along Saddleworth Road at peak times currently presents a significant risk. This is particularly apparent at school pick up and drop off times. Just before Christmas my father had an accident whilst dropping both our children off for school. The sheer amount of traffic and the narrowing of lanes (due to parked cars and HGV's) results in someone reversing into his car and causing a serious head injury. Luckily the children weren't in the car at the time. More housing will cause more injuries and safety concerns.

**Land allocation** It's difficult to understand from the information provided why Greetland has been categorised in with other local areas, i.e. Elland and Stainland, which when added together presents a misleading position of the area and the impact of so many additional homes. In addition, the only reason established (or communicated) for not focusing developments across a broader area of Brownfield sites is due to the additional costs to developers. This, in anyone's eyes, cannot be deemed 'exceptional circumstances' and the council clearly had not explored all other available options for development. Given the scale of the Calderdale area putting the majority of their housing plan across 2 close villages on green belt land says more about the politics between the different councillors representing different parties than it does about their planning capability.

**Wildlife** We



used to live in Leeds but moved to Greetland so our children could grow up in the countryside alongside wildlife. We often go for family walks along the wildlife corridor and see a vast number of animals such as deer, hedgehogs, beavers, owls, Herron and I have been told of a number of bats in the area. I just cant get my head around what exceptional circumstances with a vast number of derelict brown field sites unsupported would allow the vast development proposed along this precious wildlife corridor on green belt land ; not withstanding the years of disruption and noise the building at this scale would pose to the wildlife and the children at the local school. I would seriously question the mitigating risk of this in the plans and the extent to which the real level of wildlife in the area has been captured Flooding Development along Saddleworth Road will result in surface run off, impacting the entire area. Greetland already suffers from flooding across this proposed site. These fields act as a natural flood defence and housing development will surely increase the problem and create more flooding in the West Vale area. It is not small scale as recently demonstrated when the water ran down and flooded a number of properties and commercial outlets in west vale. The water was so strong a shipping container was removed from a west vale rugby club causing damage to a bridge in Ellend. With the current government commitments and the complex nature of the springs leading down the fields in Greetland how can turning these vast fields into concrete support and prevent the flooding which is regularly seen. The small area of land marked as flood plane already regularly goes into residents gardens, many roads all the way along from saddleworth road are often more like streams with Gate house land and other areas being prone to flooding. The NPPF states no development is to be permitted on land that is liable to flood. With millions of tax payers money being spent on flood defences in the area which still don't prevent flooding how can any of this land be classed as not liable to flood (lots of photographic evidence over the years and this year of this across all 4 proposed sites) How can the prime minister commit to stop building in areas of high probability of flooding when the majority of Calderdale housing plan is in an area which regularly floods? The mitigation comments on the plans show a real lack of understanding and wider impact of the area I would also like to point out that this site is an area of archaeological interest therefore this proposal doesn't only ruin the future of our village and community, increase pollution, put an unmanageable amount of pressure on already strained infrastructure but also disregards the history and character of the village

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

Duty to Co-operate Reason:

Calderdale council have failed to make Greetland residents aware of these plans, timescales, and the need to submit objections following recent changes and re introduction of land. The whole process lacks transparency and seems underhand. The fact the section along one stretch of road has been split into 4 areas, the complexity of the submission page and where to find the plots given they have classed under a different village name (Elland) which Greetland has never been linked to. Also from the start there was a lot of talk that this is a done deal from people who knew people who worked at the council and local farmers who's land will be sold. When objections have been submitted they have been changed or vastly delays going on the system so no one can read them. My 72 year old mother in law cried the other day after trying to object at how complex the whole system is and how her and her friend at the church and other high numbers of elderly on the area felt they were letting the community down with how complex and unsupported the process is. Also to put a disproportionate number of houses in one village on one main road on green belt appears to be more a political decision (as very few housing plans have been put forward in labour wards!) than what is right for Calderdale. The mitigations appear to be half hearted and based on one day in time and show a real lack of understanding of the history of the village and the underground spring water systems

Suggested Modifications:

Detailed understanding of the water system, infrastructure and wildlife requirements all year round with a

realistic view of the impact this will cause. A further view of all brownfield sites and sites which do not contribute to flooding devastation as these filed do. A wider view of across Calderdale not 600 houses in one village on one road.

Comments:

Additional Evidence Link:

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Comment ID **HRU1283**

Site ref (if applicable): **LP1625**

Person ID: **1243947**

Name: **mrs susan brook**

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:

see attached file

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609751>

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Comment ID **HRU1298**

Site ref (if applicable):

Person ID: **1243943**

Name: **Mrs Lucy Barrett**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The process to object is neither easy or straight forward and the online forms and documents presented are complicated, lack clarity and make it challenging and off-putting to object. I feel that insufficient time has been allowed for full consideration of all the documents which need to be read to understand this issue fully and for objections to be made. In the CC37 considered and rejected report November 2019 - it appears that the main difference with those sites rejected and the sites LP0026, LP0177, LP0952 and LP1625 which were accepted were that they didn't have a developer on board! I feel very strongly that

because there is a local developer on board is the key factor on whether a particular location was included in the Local Plan. I note that in the Consultation comments there are already a set of plans from Barratt Homes for site LP0177. The interest and profits of prospective developers should not be a reason at all (never mind a key reason) for a site being included or excluded from the plan. I believe by splitting LP0026, LP0177, LP0952 and LP1625 as separate plans the full picture is being concealed, all sites are in close proximity of each other and can only be evaluated properly if considered as a whole

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

Sound Reason:

Loss of Greenbelt I have lived in Greetland for 20 years, I have always owned a dog, therefore always used the public footpaths on all the sites in the proposed development plans. It is important to have this safe space to exercise for physical and mental wellbeing walking down Saddleworth Road with the heavy lorries hurtling down does not give you the same benefit as walking along side the river witnessing the heron and seeing my dog run through the fields and woods. The Duke of Edinburgh groups use these public rights of way as part of their expedition practices. To take away these footpaths is to deny our young people the opportunity to enjoy the countryside and open air whilst undertaking physical activity in a natural and safe environment, away from traffic, crime and pollution. To allow these developments would be to create urban sprawl, gradually encroaching on precious greenbelt Land that our community relies on for our wellbeing. There are many other sites, including disused mills, within the Calderdale catchment that do not sit within Greenbelt Land that could be considered for development before ruining for ever the Greenbelt Land in these sites. Increased risk of flooding I live at Sunnybank Lane and even the smallest amount of rain sends a torrent of water running down our lane. The effects of the flooding in Dec 2015 and more recently from storm Ciara are clear to see, the pictures and videos all over social media for anybody to review. Greetland is a high risk flood area within Calderdale. There are natural springs that pop up all over the hillsides of Greetland and added to this vast amounts of rainfall certifies the high risk flood area. We need the Greenbelt Land within these proposed development sites to act as a natural soak away and flood defence. Losing these flood plains would cause the water to simply be diverted elsewhere, causing certain flooding further down the area. The natural flood plains are nature's own defence mechanism why oh why would you take these away? The frequency of flooding is only set to increase with the change in weather conditions we are experiencing through global warming. The natural flood plains are therefore becoming increasingly important to our communities. To build on these sites would not only guarantee flooding issues and untold misery for residents and local businesses but cause increased expenditure for the council and local authorities as they will be required to assist with clean up operations, as has been seen over the last week or so in many parts of Calderdale. Loss of wildlife habitats There is an abundance of wild deer running through the fields, I witness the deer every time I walk my dog on the footpaths of the proposed sites. Along with the deer we have the beautiful kingfisher, heron, squirrels, pheasants, badgers, bats and foxes in the area. Building on the land would remove the habitats of this wildlife, therefore the wildlife would disappear. It saddens me to think my children would no longer witness nature in their community. Lack of infrastructure Greetland Academy is already full. The dentist in West Vale is full for NHS patients. The GP surgery often can't accommodate appointments. Adding an additional 600+ houses is just beyond belief on how the aforementioned will cope. The local roads are already riddled with potholes and are constantly patched. They are constantly under repair as the local drainage system is ineffective and causes regular surface issues. Add to that a level of increased traffic caused by the development as proposed and the road conditions will be worsened even further. Traffic congestion, air pollution and noise pollution Greetland and West Vale already suffer chronic traffic congestion, with the roads used not only by locals but also by the large wagons travelling to and from the Bosch Industrial Estate and the Sonoco factory. In addition, the road is used as a cut through from Ripponden and the M62. The village is already at breaking point at peak times and the roads cannot cope with the existing volume of traffic, let alone adding to that with these proposed developments. If you have a journey to Elland you need to allow

yourself and additional 10 mins to travel through Greetland and West Vale. Living at Sunnybank I see the traffic congestion at school drop off times. Saddleworth Road becomes a single lane road due to the parked cars on both sides. It becomes an obstacle course to get through and the large lorries that frequent the area make it dangerous for road users and pedestrians. Already the congestion is waiting to causing and accident and the safety of families is at risk. 600+ houses equating to on average 2 cars per family, this would be truly engulfing for the local roads. By increasing the congestion in the area, the air pollution will by default increase. This will especially have enormous impact on the young children attending the schools in the area. The playground of Sunnybank Pre-school runs adjacent with Saddleworth Road the children aged between 2 -3 would be playing out and being intoxicated with fumes from the number of passing vehicles. Additionally there would be an automatic increase of the level of noise pollution in the area.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609758>

Comment ID **HRU1306**

Site ref (if applicable): **LP1625**

Person ID: **1243963**

Name: **Mr Andrew Tweedale**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Please find the attached document titled "LP1625 Main Points of Objection"

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

Sound Reason:

Please find the attached document titled "LP1625 Main Points of Objection"

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

Duty to Co-operate Reason:

Please find the attached document titled "LP1625 Main Points of Objection"

Suggested Modifications:

N/A

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609763>

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Comment ID **HRU1316**

Site ref (if applicable): **LP1625**

Person ID: **1243964**

Name: **Miss Sarah Wilby**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Please find the attached document titled "LP1625 Main Points of Objection"

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

Sound Reason:

Please find the attached document titled "LP1625 Main Points of Objection"

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

Duty to Co-operate Reason:

Please find the attached document titled "LP1625 Main Points of Objection"

Suggested Modifications:

N/A

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609769>

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Comment ID **HRU1317**

Site ref (if applicable):

Person ID: **1243900**

Name: **Mr Jacob Travis**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The Local Plan does not address the NPPF particularly paragraph 177 and the associated PPG in the Sustainability of Greenbelt Sites. According to NPPF Para 143 it states 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' There are no VERY special circumstances for this site.

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

Sound Reason:

GREEN BELT This plot is in highly sensitive Green Belt and fulfills multiple criteria for Green Belt. It is necessary because it creates a barrier for the countryside and loss of this is likely to lead to further building

along the valley creating urban sprawl to Barkisland. Calderdale stated the Local Plan will only use 2% of the Green Belt but the proposed development in Greetland are 38% of our Green Belt which is ridiculously disproportionate. A recent report has not been made on available brown field sites, I believe the last one was in 2018, so I do not think they have exhausted these opportunities before looking at Green Belt land. In a recent meeting the Counsellor said it's difficult to get developers to use Brown Field sites 'because it was too messy' and developers prefer green field because it's easier and cheaper. These are not VERY exceptional circumstances. . URBAN SPRAWL / DISPROPORTIONATE The 2017 Calderdale Review identified LP0026 as having a 'high potential for unrestricted sprawl'. It is important we prevent Urban Sprawl as it separates our Green Belt from urban development and safeguarding the countryside from encroachment. As mentioned above the proposed developments will take away 38% of Greetland's green belt. Without this protection I am sure that 38% will increase over the year. Calderdale Council has declared a "Climate Emergency" and our green belt is a vital tool in the fight against climate change. Allowing the removal of green belt land is in direct contradiction to existing policies around climate change. Also looking at the inclusion of Elland, Greetland, West Vale and Stainland as one in the plan shows how this urban sprawl has already happened. Firstly I feel they should not be grouped together. Greetland is a village in it's own right and the assignment of this many houses to Greetland, not Elland and not Stainland and not West Vale is completely disproportionate and the council should consider adding housing to the plan for other areas. Building an additional 600 houses in Greetland is nearly a 50% increase to the number of houses here. FLOODING THESE FIELDS FLOOD. They also act in absorbing much of the water that if developed on will merely flow down the hill and worsen the flooding in the valley bottom we have just seen. 2015 and 2020 have seen horrendous floods which is costing the council millions of pounds to sort out. Allowing development on this site will only worsen the problem, cause further flooding and increase the amount the council is going to have to spend on flood damages in the future years. Also the impact on flooded communities is horrendous, homes are wrecked, livelihoods destroyed and all this development will worsen the problem. TRAFFIC CONGESTION / HIGHWAYS Greetland already suffers congestion problems and the traffic outside the school in particular is horrendous. There are local plans in place to reduce traffic in Sowerby Bridge by diverting traffic from Ripponden to Greetland along Rochdale and Saddleworth road before the addition all this proposed housing. This will lead to extremely unsafe roads, more potholes on our roads that are already in disrepair and increased travel times for local residents. This will also bring with it high levels of air pollution again contradicting the councils Climate Emergency policies. Small lanes such as Scar Bottom Lane simply can't cope with increased volumes of traffic. These are small country roads that are difficult for multiple cars to negotiate at the best of times. WILDLIFE There is a huge amount of wildlife residing in the field around Greetland including bats, foxes, deer, newts, and badgers to name but a few. If we build on this land this habitat is lost forever. ENVIRONMENTAL HEALTH / NOISE / AIR POLLUTION Calderdale council has declared a Climate Emergency yet we are hear discussing the removal of green belt land which will further add to this. I believe there is a minimum air quality level that we should not be breaching but this is not a target to work towards, it is a minimum level. The new buildings and traffic congestion will severely impact the air quality around Greetland reducing the quality significantly. The increased number of cars on the road and work ongoing will have a significant impact on local residents. INFRASTRUCUTURE The local infrastructure in Greetland can't cope with the additional housing developments. My wife is pregnant and recent went to see her midwife who ordered a blood test be carried out, this needed to be done in the next 2 weeks. There were no appointments at the local surgery in West Vale for 5 weeks so she had to go the hospital in Halifax. The school in Greetland is also not able to cope with the increased number of students that these extensive developments will bring. Parents or children can't be expected to be travelling miles and miles to get their children to school. I don't see any plans from the council to develop the infrastructure further and if they do I presume they will have to build on Green Belt land again which will again be showing urban sprawl and further loss of the green belt in Greetland. PLAN NOT RELEVANT I would suggest this plan should be revised following the outcome of BREXIT. The need for housing was built around an economic forecast for growth which is no longer relevant. Previous economic growth targets tied in to the number of new houses needed have not been

met and there is nothing to suggest that future levels will meet the forecasts. Therefore proposed housing levels and not accurate, the plan is not relevant and should be revised. I recently moved house within the Greetland area (Rochdale Road to Saddleworth Road) and did not find it difficult to find suitable housing in the area.

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

Duty to Co-operate Reason:

No effort has been made to communicate the plan or liaise with local residents

Suggested Modifications:

Site should be removed from the local plan

Comments:

Additional Evidence Link:

Comment ID **HRU1329**

Site ref (if applicable): **LP1625**

Person ID: **1243969**

Name: **Mrs Sandra Reid**

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:

The plans for LP1625 along with LP0177, LP0026 and LP0952 all cover valuable Greenbelt land in Greetland. The land provides a home to a lot of wildlife. We live in a world where we are encouraged to save animals and their natural environments, I don't believe taking away their home is in any way doing this. This land helps to reduce the flood potential in not only our area but for those downstream of us. The CMBC Flood strategy followed the Boxing Day floods of 2015. Calderdale was the worst affected borough in the UK. Greetland saw localised flooding all along the flood plain (sites LP0952 and LP0177 ) and the Black Brook. The houses on Woodfield Drive were affected. Multiple sites in West Vale were affected and further downstream the Elland Bridge collapsed and with that a £4 million repair bill. Building on this Greenbelt land will only lead to worse flash flooding as this land helps slow the flow of water to the main watercourses. Throughout Calderdale areas are struggling to find solutions to regular flooding problems, when we have land like this naturally doing its job by helping to prevent this, where is the sense in building on it? Current legislation on building on flood risk areas can be found here: <http://www.environmentlaw.org.uk/rte.asp?id=105> This contains the following quote 'new development in the flood risk areas would only be allowed when it is exceptionally necessary' I find it very hard to believe it can possibly be deemed 'exceptionally necessary' for this level of building work in small village. The risks of further flooding as mentioned alone should be enough to rule it out. One of the advantages of Greenbelt land is to reduce amounts of urban sprawl. How will building on this land effect this? I can understand and welcome development in the area, but to a limit which this plan far exceeds. Where are these extra households going to do their shopping? What provisions will be made for things such as

doctors' appointments? Dentist appointments? When will the building stop if there are more people needing more services that we currently don't have? I fear it will only lead to further building and developments in the area in the long run. The roads in Greetland currently struggle with the amount of traffic they take. Living on Sunnybank Road we see the daily battle at peak school drop off/pick up times. With so many homes being built the schools will have to expand but what about our roads? How will they cope with the extra traffic? Not only are our roads not suitable for this, the long delays this will cause will lead to much more air pollution with standing traffic. West vale is already chaotic with the amount of traffic at the best of times, this plan will lead to even more traffic wanting to go through, and the already long queues will grow. Many people have chosen to live in Greetland to benefit from its beautiful surroundings and to have the chance to be able to enjoy the surroundings and its nature in their leisure time. This contributes not only to our community's physical but also mental well being. Taking away this opportunity will have an effect on the health and quality of life of those who enjoy it regularly.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1345**

Site ref (if applicable): **LP1625**

Person ID: **1243838**

Name: **Mr John O'Hara**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The consultation process has not been publicised by the council in the local community.

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

Sound Reason:

The plan has not been positively prepared . These new site allocations are a 'knee jerk' reaction to the comments of the planning inspector. Using greenbelt land is not justified and does not effectively use the land that Calderdale has. These new site allocations are entirely inconsistent with national policy. Economic Argument Calderdale Council projects significant economic growth over the next 15 years and commissioned a report from Turley called 'Modelling the Economic Implications of the Proposed Housing Requirement' to support its projections. The housing need in the report is unrealistically based on Calderdale experiencing net migration which is above the historical average. It is a fact that net migration is falling post the Brexit referendum (see [www.migrationwatchuk.org/statistics-net-migration-statistics](http://www.migrationwatchuk.org/statistics-net-migration-statistics)) and the Government is altering (tightening) the immigration rules. It is a fact that EU free movement of people will stop in December 2020. Low skilled migrants will be refused visas (see BBC News Website 'no visas for low skilled workers, government says' 19/02/2020) How can data from 2014 (as used by Turley) be used to model economic issues in a post Brexit Britain? It cannot be justified in any way. Calderdale Council's



approach to the economics of this plan is flawed. Flooding This site soaks up and stores rainfall and slows down the surface flow rate into the Black Brook. The land already assists with flood management already see NPPF paragraph 155. The Black Brook flows into the River Calder. The River Calder regularly bursts its banks already. Building on this site will increase the regularity and severity of flooding.impermeable and all the rainfall that hits the site will turn into surface run off and the local rivers will reach and breach capacity more quickly. NPPF 163 ensures that sites which, when developed, may cause flooding elsewhere should not be used for housing. This site, if used would cause flooding in the Black Brook. Infrastructure The roads are at gridlock as it is. West Vale, Barkisland, Stainland and Ripponden are all bottlenecks for traffic. There are not enough school places for the proposed households. Sustainability The Sustainability Report for site LP1625 contains too many objectives where the impact is 'uncertain' i.e. the impact of building on this land is unknown. The plan is unsustainable. Housing densities should be increased at the Brighouse sites so as to make the plan more sustainable, land need to be put to effective use. see NPPF paras 117.118,122 & 123. These are not being applied. Green Belt This is a Green Belt Site and it is a barrier between the houses at Silverdale Terrace and the wider Green belt. If it is developed it will cause encroachment into the Green Belt. This is unjustifiable and unacceptable. The NPPF chapter 13 has been ignored by the council. Building on Green Belt should be the last resort. There are lots of Brownfield sites that could be used for new housing in Calderdale. Dwelling densities could be increased on other sites e.g. Brighouse see NPPF 122 & 123 This proposal will create urban sprawl and West Vale, Greetland and Barkisland will begin to merge into one another. Open space will be lost. NPPF Chapter 11 has also been ignored in that the Council has failed to identify more suitable sites. The council has been lazy and has not positively prepared this local plan. Wildlife The land is part of a wildlife corridor. Native birds, animals and insects will suffer if the land is built on. Pollution/traffic management/i nfrastructure Each new household will have at least one car, probably more. There will be increased air pollution from increased traffic. Chapter 9 of the NPPF is not being followed. The roads all lead to neighbouring villages being West Vale, Barkisland, Ripponden and Stainland which are already bottlenecks for traffic. .

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

Duty to Co-operate Reason:

Other councils have not been consulted properly by Calderdale council. I have seen one report involving Kirklees but nothing involving Bradford, Rochdale or Oldham.

Suggested Modifications:

The economic calculations need revisiting. LP0952, LP0026, LP1625 & LP0177 should be removed from the plan. housing Densities in Brighouse should be increased to reduce the requirement for other sites.

Comments:

Additional Evidence Link:

Comment ID **HRU1357**

Site ref (if applicable):

Person ID: **1243837**

Name: **Mr Graham Newton**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Not compliant with NPPF. There is no reason to remove land from Greenbelt until all brownfield has been utilized, Caldedale has plenty of brownfield and the excuse that no developer is interested in developing these sites is not a valid reason for taking land out of green belt. The development of this site would put undue pressure on the local infrastructure. The local School has no free space and the local medical practices are full. The road system already struggles with the present volume of traffic with long stationary tailbacks in West Vale, there is an obvious pollution problem here which could extend up the hill to the primary school on Saddleworth road. Increasing Pollution outside the playground of the school. This site is integral with the other sites in this area and as such adds to the open area for wildlife.

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

Sound Reason:

Nor compliant with NPPF

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

Duty to Co-operate Reason:

Poor advertising meant many people found out late by word of mouth meaning little time to register objections.

Suggested Modifications:

Remove from plan.

Comments:

Additional Evidence Link:

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Comment ID **HRU1360**

Site ref (if applicable): **LP1625**

Person ID: **1130385** Name: **Mr George Thomas Clayton** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

The Council have proposed a number of alterations to its Green Belt boundaries to simply meet an inflated housing target at the cost of great environmental harm. The NPPF is clear that Green Belt should only be altered in exceptional circumstances through the preparation or review of a Local Plan. Where it is necessary to consider revision of the Green Belt, this review should be robust in its justification for any alteration ; which is critically missing. The critical importance of early and meaningful engagement and collaboration with communities in producing Local Plans, particularly where this involves altering Green Belt boundaries has not been undertaken as the site has been parachuted into the plan-making process during hearing sessions. This constitutes a serious breach of procedural compliance. A local pressure group has been set up at the last moment to attempt to deal with these issues locally and has attracted a significant amount of support. However, the community has not been given the opportunity to produce a Neighbourhood Plan. Neighbourhood Plans can be used by local people to positively shape development in their area, including establishing principles for how former Green Belt sites are developed.

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

Sound Reason:

National policy is clear that Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan. The Calderdale Local Plan, which has suffered from a democratic deficit throughout its many iterations, sets a target for housing based on pre-Brexit demographic evidence of Objectively Assessed Need (OAN). This means that the Green Belt as designated in the current UDP has had to be reviewed. The OAN is far too great and as it relates to out-of-date population projections used in Strategic Housing Market Assessment (and update) that have been superseded by lower projections in more recent Office of National Statistics releases that would result in a much lower housing target and the reduce the need to release the number of Green Belt sites. Further, the ambitions of the Council for annual jobs growth over a 16 year period characteristic of a constant 'boom' inflate the requirement well beyond the realistic possibility of actual delivery. The NPPF sets out the aim of Green Belt policy which is -“to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”The NPPF explains that the Green Belt serves five purposes: (i) to check the unrestricted sprawl of large built-up areas (ii) to prevent neighbouring towns merging into one another (iii) to assist in safeguarding the countryside from encroachment (iv) to preserve the setting and special character of historic towns (v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The Council, in its own evidence, concludes that the overall parcel within which the site is located performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt but, most decisively, would see the coalescence of Greetland and West Vale and the deterioration of the identity of both places. This critically undermines the Council's Settlement Hierarchy. The most recent revisions to the Local Plan in response to the Inspector's letter include the addition of more Green Belt sites (including LP01625) for release, which represents further unsustainable development as a disproportionate amount of the new homes proposed are across just four sites in Greetland. Indeed, 1,041 additional units of the 1,708 on these new housing sites (over 60%) are proposed in the Elland area alone. There has been substantial development of land in both Greetland and Elland in recent years. This cumulative development means that the land at Ellistones Place is the only remaining parcel of the original Green Belt still in agricultural use. Development of the site would erode the visitor's understanding of the extent of the original manorial lands that Greetland covers. It is notable that the site was significantly waterlogged by storms in February 2020 alongside many others in the Calder Valley. The district is characterised by a very particular set of topographical constraints that are not replicated anywhere else in the UK, five towns are located in the valley bottom of the South Pennines. It is simply not sensible to allocate land, including a significant amount of Green Belt release, to meet inflated housing targets based on out-of-date household projections and ambitious and continual jobs growth. The housing target needs revisiting to model scenarios reflective of evidenced-based jobs growth (rather than ambitions), up-to-date household projections (including post-Brexit population projections) and the priority to contribute to sustainable development that does not harm the environment (including the Council's Climate Emergency commitments). In short, the Local Plan has been overtaken by events both demographically, economically and environmentally. At this point, the Council is proposing to adopt a Local Plan that runs entirely against the corporate ambitions of the authority. It is simply the case that no plan at all (and reliance on the NPPF & NNPG to direct new developments, which would include the protection of sensitive Green Belt) would be better than the proposed Local Plan that is under examination. The Sustainability Appraisal for the Local Plan has not been mapped or measured. The benefits of, or the opportunities for, the provision of ecosystem services by the Green Belt land directly around the urban environment are unrecorded. Section 39 of the Planning and Compulsory Purchase Act 2004 states that a local authority exercising their plan-making functions must do so with the objective of contributing to the achievement of sustainable development. Action 5 of the EU Biodiversity Strategy to 2020 requires member states to map and assess

ecosystems, whilst the Minister of State for the Environment reiterates the necessity to map and value the natural capital that make up ecosystem services, specifically in urban environments, in order to improve sustainable planning. Further, the NPPF sets out a presumption in favour of sustainable development and advises that the planning system should contribute to and enhance the natural and local environment by a number of measures that include 'recognising the wider benefits of ecosystems services'. The issues on the site flagged by the Council itself, particularly regarding traffic impacts and flooding serves to underscore that the proposals are not sustainable in NPPF terms. When the harm identified is taken into account the proposals do not amount to sustainable development. The site is unsuitable for development in accordance with national policy set out in the NPPF relating to Green Belt and Heritage Assets and recent planning case law determined by High Court Judgements relating to the siting of Listed Buildings. The proposals are not supported by Housing Infrastructure Fund (HIF) from Homes England and the inadequacy of existing infrastructure to accommodate this level of growth confirms that the proposals are unsustainable. This is outwardly recognised by the local Member of Parliament, Craig Whitaker MP, who would be expected to raise infrastructure concerns with the Secretary of State with regard to the proposed release of green belt, particularly in Greetland particularly given the lack of HIF. The Secretary of State has the power to issue a holding direction to prevent any further action in relation to the submitted local plan, including withdrawal of the plan, whilst he considers use of his intervention powers under section 21 of the Planning and Compulsory Purchase Act 2004 (-"the 2004 Act")<sup>1</sup>. The function of the planning system is to facilitate sustainable development that makes a positive contribution to the environment. It is not the role of the Council to recklessly release demonstrably unacceptable sites within the Green Belt to meet a housing target. The Inspector's letter of 16 July 2019 to the Council notes (Para. 14) that "Local Plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits". This is the undoubtedly the case here. No sensible phasing options are proposed related to release of the most sensitive Green Belt sites upon the requirement to demonstrate a five year housing land supply even if the release could be justified. It is illogical to allocate Green Belt sites in Flood Risk Zones 2 and 3 for development before brownfield sites are fully exhausted. The immediate release of the site for development is simply not a sensitive approach to the release of Green Belt land even if it were to be appropriate. Later, the Inspector asked the Council to review the option of 'the supply of more suitable and available sites elsewhere' understanding this to be an option, however, the further work on the additional sites considered (incorrectly by the Council) to be 'suitable and available' are not, in fact, suitable and, in any case, it has been revealed that this option on the site is simply not sustainable and the proposal is unsound.

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

Duty to Co-operate Reason:

Suggested Modifications:

The Local Plan proposals to release this site requirements relating to the release of the land from Green Belt ARE not positively prepared, justified, effective or consistent with National Planning Policy Framework (NPPF) and accompanying Guidance (NPPG). The principal objections to the development of the site I have outlined are (but are not limited to): Out-of-date justification of housing requirement for Green Belt release Disproportionate amount of planned development. Adequacy of the sustainability appraisal. Procedural and legal compliance issues. Lack of supporting infrastructure and funding. Demonstration of sustainable development. Given the distinct lack of soundness and legal compliance, the only modification I consider necessary is to remove the site from the Local Plan.

Comments:

Additional Evidence Link:

Comment ID **HRU1361**

Site ref (if applicable): **LP1625**

Person ID: **1243840**

Name: **Mr James O'Hara**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The consultation process has not been publicised.

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

Sound Reason:

Economics Calderdale council believes that it needs more housing because there will be more jobs in Calderdale over the next 15 years and more people will wish to live here. This is not the case. The plan is based on flawed economics. The report that the Council relies upon from Turley 'Modelling the Economic Implications of the Proposed Housing Requirement' is based on 2014 data which pre dates Brexit and is very unreliable. Net migration to the UK is falling see: [www.migrationwatchuk.org/statistics-net-migration-statistics](http://www.migrationwatchuk.org/statistics-net-migration-statistics). Whereas Turley project that migration to Calderdale will be above historical averages. This is not true and is not supported by any evidence. There is a shortage of working age people nationally and locally. The free movement of people within the EU block will end in December 2020 and immigration rules are to get tighter. Low skilled workers will not get visas see The Times 20/02/2020 and the comments of the Home Secretary, Priti Patel. There will not be enough people to live in all the homes Calderdale Council wishes to plan for. Flooding The site as a whole site soaks up rainfall and slows down the transit of water to the nearby Black Brook (river). The council has not adhered to NPPF 155 or NPPF 163 when including this site in the Local Plan. Building on this site will cause West Vale, Elland and Brighouse to flood and quickly. If this land is built upon there will be shorter lag times between peak rainfall and peak river flow of the Black Brook and the River Calder. It will certainly cause floods at West Vale, Elland and Brighouse. The risks cannot be mitigated against with cash expenditure, or at all, and lessons need to be learned from the floods in neighbouring Mytholmroyd where the Environment Agency has spent (some may say wasted) £millions on flood defences and mitigation plans which do not work. This land is not suitable for development. The DEFRA secretary, George Eustice MP, said on BBC Radio 5L on 17/02/2020 at 08:07 'We do have to think about how we manage water catchments upstream and that's why we're committing £4bn over the next 5 years and we are very keen to look at nature based solutions so natural dams, slowing water courses down using natural flood plains so that we don't have the water getting down into our urban areas in the first place.' Listen to the message from Westminster, the land in question should not be built upon. Green Belt. The site is a beautiful example of Green Belt land it separates Silverdale terrace from the wider Green Belt. Calderdale council has not adhered to NPPF Chapter 13 and has not demonstrated why a suburb of a former industrial town need to be used for housing when there are sufficient numbers of Brownfield sites to meet any housing need. Brownfield sites in Calderdale are predominantly in urban areas so using them would reduce the transportation burden on outlying settlements. See chapter 9 NPPF. I have not seen a Brownfield Site Register per NPPF para 119 and assume that this council does not keep one. Sustainability The sustainability appraisal for this site contains too many 'uncertain' outcomes. Basically the council doesn't know what the impact of building on this land will be but are prepared to allow building to occur nonetheless. this is unsustainable. Housing densities The housing densities at the Brighouse sites could easily be increased to absorb much of the housing requirement involving the Green Belt Land in Greetland. See NPPF paras 122 & 123. Wildlife The site is

home to bats, deer, foxes insects and other invertebrates. it is vital habitat that should be protected. It is a recognised wildlife corridor. Infrastructure The roads cannot cope with the existing traffic and new development will make an already bad situation worse.

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

Duty to Co-operate Reason:

The council has not cooperated with other neighbouring councils.

Suggested Modifications:

Remove LP1625, LP0026, LP0952 & LP0177 from the local plan. Prepare a Brownfield site register. Increase housing densities in Brighouse to save this Green Belt. Draft a new and realistic economic model.

Comments:

Additional Evidence Link:

Comment ID **HRU1369**

Site ref (if applicable): **Lp1625**

Person ID: **953094**

Name: **Mrs Joanne Clayton**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The Council have proposed a number of alterations to its Green Belt boundaries to simply meet an inflated housing target at the cost of great environmental harm. The NPPF is clear that Green Belt should only be altered in exceptional circumstances through the preparation or review of a Local Plan. Where it is necessary to consider revision of the Green Belt, this review should be robust in its justification for any alteration ; which is critically missing. The critical importance of early and meaningful engagement and collaboration with communities in producing Local Plans, particularly where this involves altering Green Belt boundaries has not been undertaken as the site has been parachuted into the plan-making process during hearing sessions. This constitutes a serious breach of procedural compliance. A local pressure group has been set up at the last moment to attempt to deal with these issues locally and has attracted a significant amount of support. However, the community has not been given the opportunity to produce a Neighbourhood Plan. Neighbourhood Plans can be used by local people to positively shape development in their area, including establishing principles for how former Green Belt sites are developed.

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

Sound Reason:

National policy is clear that Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan. The Calderdale Local Plan, which has suffered from a democratic deficit throughout its many iterations, sets a target for housing based on pre-Brexit demographic evidence of Objectively Assessed Need (OAN). This means that the Green Belt as designated in the current UDP has had to be reviewed. The OAN is far too great and as it relates to out-of-date population projections used in Strategic Housing Market Assessment (and update) that have been superseded by lower projections in more recent Office of National Statistics releases that would result in a

much lower housing target and the reduce the need to release the number of Green Belt sites. Further, the ambitions of the Council for annual jobs growth over a 16 year period characteristic of a constant 'boom' inflate the requirement well beyond the realistic possibility of actual delivery. The NPPF sets out the aim of Green Belt policy which is -“to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”The NPPF explains that the Green Belt serves five purposes: (i) to check the unrestricted sprawl of large built-up areas (ii) to prevent neighbouring towns merging into one another (iii) to assist in safeguarding the countryside from encroachment (iv) to preserve the setting and special character of historic towns (v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The Council, in its own evidence, concludes that the overall parcel within which the site is located performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt but, most decisively, would see the coalescence of Greetland and West Vale and the deterioration of the identity of both places. This critically undermines the Council's Settlement Hierarchy. The most recent revisions to the Local Plan in response to the Inspector's letter include the addition of more Green Belt sites (including LP01625) for release, which represents further unsustainable development as a disproportionate amount of the new homes proposed are across just four sites in Greetland. Indeed, 1,041 additional units of the 1,708 on these new housing sites (over 60%) are proposed in the Elland area alone. There has been substantial development of land in both Greetland and Elland in recent years. This cumulative development means that the land at this site is the only remaining parcel of the original Green Belt still in agricultural use. Development of the site would erode the visitor's understanding of the extent of the original manorial lands that Greetland covers. It is notable that the site was significantly waterlogged by storms in February 2020 alongside many others in the Calder Valley. The district is characterised by a very particular set of topographical constraints that are not replicated anywhere else in the UK, five towns are located in the valley bottom of the South Pennines. It is simply not sensible to allocate land, including a significant amount of Green Belt release, to meet inflated housing targets based on out-of-date household projections and ambitious and continual jobs growth. The housing target needs revisiting to model scenarios reflective of evidenced-based jobs growth (rather than ambitions), up-to-date household projections (including post-Brexit population projections) and the priority to contribute to sustainable development that does not harm the environment (including the Council's Climate Emergency commitments). In short, the Local Plan has been overtaken by events both demographically, economically and environmentally. At this point, the Council is proposing to adopt a Local Plan that runs entirely against the corporate ambitions of the authority. It is simply the case that no plan at all (and reliance on the NPPF & NNPG to direct new developments, which would include the protection of sensitive Green Belt) would be better than the proposed Local Plan that is under examination. The Sustainability Appraisal for the Local Plan has not been mapped or measured. The benefits of, or the opportunities for, the provision of ecosystem services by the Green Belt land directly around the urban environment are unrecorded. Section 39 of the Planning and Compulsory Purchase Act 2004 states that a local authority exercising their plan-making functions must do so with the objective of contributing to the achievement of sustainable development. Action 5 of the EU Biodiversity Strategy to 2020 requires member states to map and assess ecosystems, whilst the Minister of State for the Environment reiterates the necessity to map and value the natural capital that make up ecosystem services, specifically in urban environments, in order to improve sustainable planning. Further, the NPPF sets out a presumption in favour of sustainable development and advises that the planning system should contribute to and enhance the natural and local environment by a number of measures that include 'recognising the wider benefits of ecosystems services'. The issues on the site flagged by the Council itself, particularly regarding traffic impacts and flooding serves to underscore that the proposals are not sustainable in NPPF terms. When the harm identified is taken into account the proposals do not amount to sustainable development. The site is unsuitable for development in accordance with national policy set out in the NPPF relating to Green Belt and Heritage Assets and recent planning case law determined by High Court Judgements relating to the siting of Listed Buildings.

The proposals are not supported by Housing Infrastructure Fund (HIF) from Homes England and the inadequacy of existing infrastructure to accommodate this level of growth confirms that the proposals are unsustainable. This is outwardly recognised by the local Member of Parliament, Craig Whitaker MP, who would be expected to raise infrastructure concerns with the Secretary of State with regard to the proposed release of green belt, particularly in Greetland particularly given the lack of HIF. The Secretary of State has the power to issue a holding direction to prevent any further action in relation to the submitted local plan, including withdrawal of the plan, whilst he considers use of his intervention powers under section 21 of the Planning and Compulsory Purchase Act 2004 (-"the 2004 Act")<sup>7</sup>. The function of the planning system is to facilitate sustainable development that makes a positive contribution to the environment. It is not the role of the Council to recklessly release demonstrably unacceptable sites within the Green Belt to meet a housing target. The Inspector's letter of 16 July 2019 to the Council notes (Para. 14) that "Local Plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits". This is the undoubtedly the case here. No sensible phasing options are proposed related to release of the most sensitive Green Belt sites upon the requirement to demonstrate a five year housing land supply even if the release could be justified. It is illogical to allocate Green Belt sites in Flood Risk Zones 2 and 3 for development before brownfield sites are fully exhausted. The immediate release of the site for development is simply not a sensitive approach to the release of Green Belt land even if it were to be appropriate. Later, the Inspector asked the Council to review the option of 'the supply of more suitable and available sites elsewhere' understanding this to be an option, however, the further work on the additional sites considered (incorrectly by the Council) to be 'suitable and available' are not, in fact, suitable and, in any case, it has been revealed that this option on the site is simply not sustainable and the proposal is unsound.

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

Duty to Co-operate Reason:

Suggested Modifications:

The Local Plan proposals to release this site requirements relating to the release of the land from Green Belt ARE not positively prepared, justified, effective or consistent with National Planning Policy Framework (NPPF) and accompanying Guidance (NPPG). The principal objections to the development of the site I have outlined are (but are not limited to): Out-of-date justification of housing requirement for Green Belt release Disproportionate amount of planned development. Adequacy of the sustainability appraisal. Implications of flood risk. Procedural and legal compliance issues. Lack of supporting infrastructure and funding. Demonstration of sustainable development. Given the distinct lack of soundness and legal compliance, the only modification I consider necessary is to remove the site from the Local Plan.

Comments:

Additional Evidence Link:

Comment ID **HRU1375**

Site ref (if applicable): **LP1625**

Person ID: **1243839**

Name: **Mrs Frances O'Hara**

Organisation:

Agent ID:

Name:

Organisation:

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



#### Legal Compliance Reason:

The sustainability reports for the sites is not fit for purpose. There are too many uncertainties therein. An objective decision cannot be arrived, where faced with an uncertainty the presumption should be that a negative impact will transpire.

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

#### Sound Reason:

Economy The housing 'need' advised within the local plan is based on flawed economics. Firstly the migration projections within Turley's report for Calderdale Council: 'Modelling the Economic Implications of the Proposed Housing Requirement' pre date Brexit and its potential effects on trade, interest rates, inflation and crucially migration. There is a shortage of working age people nationally, in Yorkshire and in Calderdale, even if these homes are built there will not be enough 'workers' to fill them. The council was given the option by the Inspector of revising down its economic projections but instead chose to maintain them and allocate more housing to Green Belt sites. The very fact that Calderdale Council could not calculate its housing need based on its own projections first time around highlights how unsound their methodology is. Recent figures confirm that net migration is falling. This has been the case since 2015. Visit: [www.migrationwatchuk.org/statistics-net-migration-statistics](http://www.migrationwatchuk.org/statistics-net-migration-statistics) Section 3.8 of Turley's report relies on higher rates of net migration than the historic average, this is unrealistic. The government is to introduce a points based immigration system and we are told that unskilled workers will not get visas: Priti Patel in the Times 20/02/2020. The extant population is having fewer children and birth rates are declining. The housing need as projected by Calderdale does not exist, there are not enough workers. The household formation projections in Turley's analysis are based on 2014 data which is before the Brexit referendum was even contemplated. The UK has now left the E.U. so the data is unreliable. The 2016 data is, by HM Governments own admission unreliable. It is difficult to understand why older data from a different political era is reliable. Sustainability The updated Sustainability Appraisal for this site refers to 17 objectives which are scored on a traffic light system from Positive (green) Uncertain (yellow) Negative (red). Of the 17 indicative objectives 1 is n/A, just 4 are marked Green, 1 is Red and 11 are yellow. The report has not been prepared properly and is misleading for example Objective 10: TO REDUCE POLLUTION LEVELS AND CO2 EMISSIONS TO TARGET LEVEL is marked as 'uncertain' yet the land is green belt and away from economic centres. Every resident who lives in one of the proposed dwellings will have a car. This will have a negative impact on traffic and the environment and increase CO2 levels. The answer to this Question as provided by Calderdale is childlike: 'The impact on this Objective is uncertain as it would depend on the development delivered.' This response/answer is from the planning authority which can dictate exactly what development occurs at this site and still they simply do not know what will happen. It is not good enough. Plainly not enough analysis of the sites has been carried out. The answer to any planning question should not be 'uncertain'. Calderdale Council should 'follow' the question until they find an answer be it negative or positive, they should not stop at uncertain. That is not best planning practice and is unacceptable. How does this demonstrate that there are exceptional circumstances to use this Green Belt land per Chapter 13 NPPF? It simply does not. Flooding Building on it will increase the frequency and severity of flooding at this site and will also increase flooding elsewhere and in particular in West Vale, Elland and Brighouse. This is against the NPPF paras 155 & 163. The Calder Valley is at a unique risk of flooding (as said by the Environment Agency), this is recognised by government and there have been significant floods within the last 8 years, the most recent being as a result of storms Ciara and Dennis in February 2020. The risk cannot be mitigated. Tens of millions of pounds have been spent in the Upper Calder Valley and still Hebden Bridge, Mytholmroyd and Sowerby Bridge experience regular devastating flooding. The Black Brook flows at the bottom of this site and feeds into the River Calder. To build on this site would be to knowingly increase the regularity of floods in West Vale, Elland, Brighouse and beyond. There would be: \* Increased surface water runoff \* Reduced peak rainfall/peak flow lag times \* Loss of natural water storage \* Loss of flood plains \* Increased transit speeds of rainfall \* Increased peak flow

volumes \* More frequent flooding Green Belt Chapter 13 of the NPPF promotes the green belt. Calderdale Council has simply ignored the NPPF, it has not demonstrated that it is seeking to use as much Brownfield Sites as possible. Halifax is a former industrial town it is littered with Brownfield Sites which could be utilised for housing. The council has not demonstrated 'exceptional circumstances' so as to even consider using Green Belt land nor has it kept a Brownfield Site Register per NPPF para 119. Housing Densities The council could comfortably increase housing densities (NPPF paras 122 & 123) on other allocated sites and this this would protect this site. The housing densities should be increased elsewhere e.g. Brighouse sites. It is unsustainable not to increase densities elsewhere Climate Emergency Calderdale Council has declared a 'Climate Emergency' yet wants to use Green Belt land for housing. The two concepts are mutually exclusive of one another. Green Belt Land stores CO2 and oxygenates the atmosphere. Ecology/Wildlife This site is part of a Wildlife Corridor and if it is built on there will be loss of habitat for hundreds of species of animals and insects but most strikingly loss of habitat for bats, owls, deer, badger, fox, hawks etc etc Infrastructure The local schools will not cope with extra headcount in the locality. There are not enough doctors, dentists, etc. The roads are clogged up as it is. Again see the sustainability reports, this is a rural site, the residents will be driving, they will not be using public transport.

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

Duty to Co-operate Reason:

There has been little or no corporation will ALL neighbouring councils.

Suggested Modifications:

Remove LP0026,LP0952,LP0177 & LP1625 from the Local plan. Liaise with other authorities to take Calderdale's additional (highly questionable) housing need so as to prevent flooding in Calderdale which according to the Environment Agency is at 'unique risk' of flooding. Prepare post Brexit economic forecast. Increase housing densities in Brighouse to save Greetland Green Belt at the four locations/sites listed.

Comments:

Additional Evidence Link:

Comment ID **HRU1377**

Site ref (if applicable): **LP1625**

Person ID: **1243978**

Name: **Mr Denis Reid**

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:

Plans LP1625 along with LP0952, LP0026 and LP0177 together cover a massive stretch of naturally beautiful land in our local community. This land is classified as a 'most sensitive' greenbelt, please find evidence of this in the following link to the Councils Greenbelt Review:

[https://calderdale.gov.uk/v2/maps/green-belt-review?fbclid=IwAR0-YtEHRsU5\\_gSN2JMA4zPU97P0GPsWU0\\_lq263NGHjCx4\\_m66ibHv8vaQ](https://calderdale.gov.uk/v2/maps/green-belt-review?fbclid=IwAR0-YtEHRsU5_gSN2JMA4zPU97P0GPsWU0_lq263NGHjCx4_m66ibHv8vaQ) How can it be justified to be building on this sensitive land that provides a home to so much wildlife, prevents and protects local areas from flooding and also provides us with a public right of way? Many people use this land for leisure purposes to get out into nature and walk. Building here will take away this opportunity for many and therefore have a direct impact on the communities physical and mental health. The plans outline for a number of homes (approx.. 600 over the 4 mentioned sites) to be built on this land. We are a relatively small village as we stand and the prospect of adding these kind of numbers will cripple our already struggling services. Where are these people going to register for doctors' appointments? NHS Dental appointments? Many in the local area already struggle with waiting times for these services and this plan will lead to this worsening. With people being unable to get these doctors appointments this will lead directly to increased hospital admissions putting a strain on the NHS. The local roads in the area already struggle with the amount of traffic going through the village and ending up at a standstill in Westvale. These plans will put a further 600+ cars on our roads. These roads will not physically cope with that much traffic. It will also lead to long delays coming and going from the area which will see the air pollution rise especially around our local schools leading to further health issues for our communities' residents. The school pick/drop off time at the school on Saddleworth road is already chaotic at the best of times, how are we going to deal with even more people needing to be there at the same time? On a number of recent occasions, the local area has seen frequent flash flooding. These sites work as a natural flood defence for our area and also help to prevent flooding to areas down stream of us. The last few years have shown us that these incidents are occurring more and more often, do we really want to build on land that is naturally doing it's job to protect us? Throughout Calderdale a number of areas such as Sowerby Bridge and Hebden Bridge are currently having the spend millions on the clean up from floods and trying to fund prevention for future flooding. With that in mind, why would we want to add further problems to the area when we are already struggling? I can appreciate the need for some development to areas where more housing is required, but this amount of new homes in a small village like ours can not be justified. It will change the entire landscape of the village and have a direct negative impact on the quality of life for many.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1392**

Site ref (if applicable): **LP1625**

Person ID: **1243971**

Name: **Mr Steve Hannah**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The Local Plan does not address the implications of the National Planning Policy Framework, especially,

NPPF Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. According to the NPPF Para 143 under 'Proposals affecting the Green Belt' it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' The very special circumstances do not apply. Other reasons not legally compliant. Residents of Greetland not made aware of proposal and given opportunity to comment. The other reasons cited for excluding sites such as Green Belt, Access, Wildlife issues, Flooding constraints all apply to sites LP0026, LP0177, LP0952 and LP1625 and therefore these sites should equally be rejected from the Local plan. Importantly, I would also comment that plans LP0026 (The Gate Farm), LP0177 (Land adjacent Ellistones Place), LP0952 (Land at New Gate Farm) and LP1625 (Land to the west of Silverdale Terrace) should not be considered as separate proposals. They are so interrelated (sited within a small 1 km area along Saddleworth Road) that they can only be assessed fairly if considered as a whole. By splitting them out as separate plans the full picture is being concealed. My comments therefore are relevant to each of the plans LP0026, LP0177, LP0952 and LP1625 and should be considered as equal objections to all four sites.

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

Sound Reason:

My main points of objection are as follows: Loss of Greenbelt land Increased risk of flooding Loss of Wildlife Habitats Lack of Infrastructure Traffic congestion, Increased air pollution Loss of Greenbelt Land Loss of amenity Loss of public footpath routes Creation of urban sprawl, Loss of wildlife habitat - foxes, badgers, bats, rabbits, deer exist within proposed development sites and adjacent areas The NPPF at a para 133 states that - "The Government attaches great importance to Green Belts" and at para 136 that - "Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified" At para 144 it further states - "local planning authorities should ensure that substantial weight is given to any harm to the green belt" and at para 145 - "a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt" Building on these sites is contradictory to all of these statements. When each of the 4 sites are reviewed together a large and disproportionate area of open space would be lost to this small community. At para 137 the NPPF states '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.' I do not agree that the authority in this case has satisfied these conditions. There are many other sites, including disused mills, within the Calderdale catchment that do not sit within Greenbelt Land that could be considered for development before ruining for ever the Greenbelt Land in these sites. Increased risk of flooding Para 155 of the NPPF states that 'Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas of highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere' Losing the fields will reduce the potential for water to be slowed down before it enters the river. Run off will increase and the rate water reaches the river/flood plain will increase therefore increase the frequency and severity of flood (which it already does); see images attached. Loss of Wildlife Habitats Para 177 NPPF states that 'The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site'. I would argue that building on the land which is included in these proposals will be extremely detrimental to the wild animals within the area. No mitigation can prevent the impact of urban sprawl and the destruction of their natural habitats. Lack of Infrastructure The local schools are already full. The local dentists have long NHS waiting lists. The GP surgery is full and often can't accommodate appointment requests. Adding an additional 600+ houses and the associated increase in residents is simply unsustainable. The existing drain system cannot cope with rain water at present and raw sewage is regularly seen entering fields and the Black Brook stream when it rains. The sewers also

regularly contaminate the footpath which runs along side the footpath below the proposed development sites. Traffic congestion, air pollution and noise pollution Greetland and West Vale already suffer chronic traffic congestion, The village is already at breaking point at peak times and the roads cannot cope with the existing volume of traffic, let alone adding to that with these proposed developments. At school drop off times Saddleworth Road becomes a single lane road due to the parked cars on both sides. It becomes an obstacle course to get through and the large lorries that frequent the area make it dangerous for road users and pedestrians. I fear for the lives of the children trying to get to school daily.. Increased air pollution More houses, more people, more cars = more air pollution. Less flora to with the loss of fields/trees further compounds the negative impact of increase emissions/pollution.

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

Duty to Co-operate Reason:

Suggested Modifications:

Retain green belt, do not develop

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609788>

Comment ID **HRU1396**

Site ref (if applicable): **LP1625**

Person ID: **1128683**

Name: **Mr Ryan O'Hara**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The site sustainability appraisals contain too many 'uncertain' outcomes. Turley's report relies on out dated data. The consultation period has not been publicised by the council.

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

Sound Reason:

Sustainability The sustainability appraisal for this site raises more questions than it answers. The report has not been positively prepared as a result. Of the 17 Objectives listed in the site appraisal 11 are 'uncertain', 1 is negative and just 4 positive. (1 is n/a) The council can only list 4 positive reasons for building on this Green Belt land - that is not good enough. The land should not be built upon. The report is misleading, Objective 7: TO REDUCE THE RISK OF FLOODING AND RESULTING DETRIMENTAL EFFECTS ON PEOPLE AND PROPERTY ' is marked as uncertain. The land is on the side of a valley and surface run off flows into the Black Brook river. Neighbouring site down stream being LP0177 already floods. Building on this land will make the problem much, much worse and will cause flooding at West Vale, Elland and Brighouse. To the my eyes this assessment is clear in that there will be a negative impact for this objective and others.. It is not sustainable to build on Green Belt land. Permitting the inclusion of Green Belt within this plan will set a precedent for future plans where more Green belt will be lost. Building on Green Belt is the easy option, it is attractive to developers and it makes the most profit. However it is the most damaging to the environment and the communities in which we live. Chapter 13 of the NPPF sets out the

policy for protecting the Green Belt and Calderdale council simply has not adhered to it. Flooding This site acts as a natural water store when it rains, it slows down the transit of water into the Black Brook which flows at the bottom of the site. If this site is used it will ensure that West Vale, Elland and Brighouse experience more frequent and more severe flooding at it will take away a vital flood plain. Using this site is against NPPF paras 155 & 163. If this land is developed it will put lives in danger. According to the Environment Agency the Calder Valley is 'at unique risk of flooding'. The risks cannot be mitigated against, the only mitigation is to build housing which is not on steep sided valleys and which is away from water courses. This site is on the side of a valley, it has a river, the Black Brook, running in the valley bottom. It regularly acts as a flood plain. The DEFRA secretary, George Eustice MP, has this week confirmed that natural flood management measure should be retained. Building on this land will destroy natural water management features. Housing need within the Local Plan The council calculates a housing need based on unsound economic arguments. The council commissioned a report from Turley called: Modelling the Economic Implications of the Proposed Housing Requirement The report relies on data from 2014 to argue that there will be more jobs in Calderdale in the next 15 years, thus more workers therefore we need more homes. The analysis relies on Calderdale experiencing migration in excess of historical averages. This is unrealistic because the UK has now left the EU and free movement of people is to end, in any case, net migration is falling and has been since 2015 (see : [www.migrationwatchuk.org/statistics-net-migration-statistics](http://www.migrationwatchuk.org/statistics-net-migration-statistics)) The statistics used by Turley rely on the UK being an EU member state. The reality is that birth rates are falling, retirees are increasing in number and net migration is falling. It is unsound to base an economic requirement for housing on data which is obsolete and still the only way that Turley can justify the housing need is to argue that Calderdale will somehow experience migration levels above the historical average. It is unrealistic. The housing need is overstated dramatically. The number of homes in the Local Plan is unjustified. Green Belt Using this land is against the aims of Chapter 13 of the NPPF. There are not exceptional circumstances to allow this valuable green belt to be used for building. The land stops urban sprawl from the properties at the adjacent Silverdale Terrace . Climate Emergency Calderdale Council has declared a 'climate emergency' yet wants to build on green belt sites away from towns and public transport. The grassland absorbs and stores CO2. Anyone who lives on the site will need a car to get around in. This is short-sighted planning and will exacerbate the climate emergency Brownfield Sites Halifax is a former Mill Town with an abundance of Brownfield sites suitable for housing. The council has not produced a Brownfield Register contrary to NPF para 119. Housing Densities The pre-existing Local plan sites can accommodate increased housing densities and increasing the densities in Brighouse for example, would protect LP0952, LP0026, LP0177 & LP1625. Infrastructure There is already heavy congestion in the villages of West Vale, Barkisland, Stainland and Ripponden. This site is in a rural location and residents will be reliant on cars. Chapter 9 of the NPPF has not been followed when considering this location. Fore example NPPF para 102(c) has not been followed, this site will not promote the use of cycling or walking.

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

Duty to Co-operate Reason:

The local authority has not liaised with ALL neighbouring councils.

Suggested Modifications:

Remove LP0026,LP0952,LP0177 & LP1625 from the Calderdale Local plan. Increase housing densities in Brighouse. Obtain an economic forecast based on the realities of the current migration numbers, the proposed immigration rules and the fact that the UK is no longer an EU member state.

Comments:

Additional Evidence Link:

Comment ID **HRU1401**

Site ref (if applicable): **LP1625**

Person ID: **1243021**

Name: **Mrs Laura Palfrey**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

There has been no consultation regarding this plan before it was submitted to the inspector. The NPPF states that green belt land should only be built on in exceptional circumstances, the plans do not sure any exceptional circumstances, especially when there is brownfield sites available through Calderdale.

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

Sound Reason:

Flooding This is a flood plain, recent floods have shown that the field stops the flood waters impacting homes and businesses. As Calderdale Council have declared a climate emergency this land should be revised as the risk of flooding will be greater in the future. The plan states that there is a risk of surface water flooding, recent storms have shown that there is a lot more than surface water in this area. Green belt There will be a loss to wildlife that is abundant in the area. Air Pollution The amount of cars added to the area would increase substantially, this would cause more air pollution for Key stage 1 schools on Saddleworth Road, and West Vale primary school, where the playground already sits beside a busy road. Traffic There seems to be no planning for the additional traffic, there are not many routes in and out of Greetland and they are already very busy at key times. There is very limited public transport in the area. Doctors Surgery There is no plan to build a new doctors surgery, with so many houses the service will be very stretched. School Greetland Academy is already oversubscribed, class sizes are already at 60 children per year, if this is pushed up it would impact the education given. No plan for a new school has been issued to deal with the additional number of children to move into the area. Additional Commentary The plan has been split into several different areas, because of this the amount of new houses does not look as large, until all the areas are taken into account. This should be made clearer. It also makes objecting a lot harder for members of the public which should be an easy to follow process.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1403**

Site ref (if applicable): **LP1625**

Person ID: **1243814**

Name: **Mrs Jennifer Sumner**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Hardly any community involvement, lack of communication, which is very unfair and unacceptable.

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

Sound Reason:

My objections are: Loss of Greenbelt: Land is precious and should be protected. Loss of greenbelt would have a huge impact on the local wildlife and the local residents and their well being! The loss of greenbelt would lead to a huge increase in urban sprawl! Flooding: The proposed plan is for high rise flood areas and any development and loss of the fields, which soak up rainfall and spring water, will be detrimental to houses and businesses in and around West Vale! This would also impact on surrounding areas around the Calder such as Brighouse and Mirfield. Areas that have had development on flood plains have proven to be a huge issue over the last couple of weeks. Surely this is proof that building on flood plains is not the right solution for the housing issue. Infrastructure: Greetland is a village not a town and will not cope with 600 new homes, such as the doctors (waiting times are already unreasonable), school (class sizes already at the top end) and dentist (only one current local NHS dentist). The congestion of cars will reduce air quality and therefore the health of our future generation will be in jeopardy. Wildlife: The community enjoys the local wildlife of many species. Some are protected, ie bats, deer, herons, owls etc. To remove their livelihoods would be a travesty! Air Pollution and Traffic: West Vale/Greetland is in a valley and therefore traps fumes from traffic. Increasing the amount of traffic via these proposed developments would cause ill health to many people, children and the aged. Currently West Vale cannot cope with the amount of traffic travelling through, as 4 directions of traffic flow through.

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

Duty to Co-operate Reason:

Suggested Modifications:

Brownfield should be considered for future developments not flood plains.

Comments:

Additional Evidence Link:

Comment ID **HRU1413**

Site ref (if applicable): **LP1625**

Person ID: **1243514**

Name: **Dr Dale Pateman**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

This proposed development plan as we see it now is a revitalised version of what we saw a couple of years ago, but things have changed since then. The housing requirement is based upon the economic growth plan which itself has fluid foundations given the continuing effect of globalisation and specifically the



brand new relationship between the EU and an independent UK. This fluidity is not to be underestimated, not only in Calderdale, but for the nation. We have, as a community, a responsibility to respond to this for the good of us all. Plans, policy and legislation as developed by various responsible authorities have great difficulty in keeping up with events, which are changing weekly. Individuals and Councils alike have a responsibility to observe what is happening. In respect of the proposed housing plan, my view is that Calderdale Council have taken on board the requirement imposed by central Government, even if (as is most likely) it is out of date. But in response, they have elected to take a top down approach so as to most easily comply. The proper approach would be a bottom up view which would include detailed subjective analysis of the gain/loss to the whole community as well as to the Council itself. The top down approach has the undesirable effect of failing to properly address the following significant factors. Flood risk. The whole of the extensive hillside, which is Greetland, is afflicted by spring water arising from a complex system of pervious and impervious layers of ground strata. What would be the effect of additional construction and sealing of the ground surface? In any case the result is that land adjacent to the Black Brook is frequently flooded, to a measurable depth, following periods of heavy rainfall. The effect of the early February 2020 rainfall supports this. Construction of any development on this hillside would exacerbate this effect and cause potential additional problems everywhere downstream of any development. Congestion. It is the view of many that current levels of traffic are just acceptable. The additional load of traffic resulting from the proposed housing development would surely choke the Saddleworth Road / Stainland Road junction as well as contributing significantly to air pollution at peak times. Pollution. As well as the predictable commuter traffic, Saddleworth Road is used by a significant amount of HGV traffic serving businesses whose only reasonable access is Saddleworth Road. Already, this combined traffic is a health risk to children attending Greetland Primary School on Saddleworth Road. The plan would potentially create such an increase in traffic as to see it queuing up Saddleworth Road as far as the school. The children are at increased risk here since the most damaging pollutants are heavier than air and occupy the same space as the children themselves. This will still be the case when IC engines give way to electric vehicles since there is still significant pollution from friction braking systems and tyre wear. Infrastructure. Current provision is unlikely to meet proposed demand. Transport, Medical, Dentists, Schools, Leisure. Has the Council assessed these requirements or ensured that some other authority will do? Choice of sites Greetland has been chosen for development ahead of available and potential brownfield sites closer to town centres. If affordable housing is even part of any proposal, surely the people who would most likely occupy it would also benefit from affordable access to amenities and not have to travel longer distances at greater expense. Green Belt and Wildlife. The proposed development is of Green Belt land, whose designation has as much relevance and purpose now as it did when first instituted. In this valley it provides a perfect introduction to nature, and is a perfect jumping off point for all the people of Greetland and its environs (especially children), for further investigation and understanding of issues such as cycles of life and climate change. This facility is on the doorstep and only a short distance from other population centres. No doubt the Council will have taken steps to be sure that it is behaving legally in the formulation of its plan, and I trust that this is the case. But surely very purpose of its existence is to look after, promote and nurture the lives of its population ; its electors, and it is in this sense that I am of the view that the plan is not legally compliant. Whilst it may be technically legal, the plan is not providing the best overall service to the residents of the HX area of Calderdale.

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

Sound Reason:

I consider that the plan as it relates to Greetland to be ill-founded for the above reasons. In addition the scale of the development is greatly in excess of anything that the local infrastructure can take.

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

Duty to Co-operate Reason:

The Council has not made sufficient effort to publicise their purpose, their meetings, their research, or their reasons. They have not allowed time for decisions to be absorbed before following steps needed to be taken. The council has not shown how it has investigated potential use of Brown site for housing use.

Suggested Modifications:

The sites LP0026, LP0952, LP0177, and LP1625 in the Greetland area should be removed from the development plan.

Comments:

Additional Evidence Link:

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Comment ID **HRU1422**

Site ref (if applicable):

Person ID: **1243823**

Name: **Miss Alison Thelwell**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I strongly object to this proposal on the grounds of A. The increased traffic and noise pollution which will be generated. We are currently about half way through gas repair works at one of the key crossroads in west vale and at all times of the day traffic heavily builds up. This is an indication of how congested the area will become on a daily basis. At the other West Vale crossroads turning from the Elland direction towards Halifax is already difficult sometimes with just one car moving through the lights in time and this goes on to strain the rest of the road network. I believe it was considered a few years ago that it wouldn't be possible for a second filter lane to be created to ease congestion so this will be something which will only become an even greater problem. B. The newly generated traffic from the proposed site could lead to Sunnybank road becoming a rat run as commuters use it to avoid one set of traffic lights on the way to Halifax. C. Our current Schools are already at full capacity, how will it they handle the increased population? Our current schools cannot surely handle this increase. Greetland on its own is only a small village and cannot be expected to cope with this. D. The lower grounds of the village are very well known to become flooded during spells of bad weather. This has been well publicised this month alone. Removing much needed green belt land will no doubt push the problem elsewhere. We need the open fields to soak up excess rainfall and act as a natural flood defence system. Tarmaced housing estates in its place will lead to catastrophic consequences in this situation. E. The area has current derelict brown field sites. Why cannot these be considered as potential sites which will improve the area and in turn save our green belt land.

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

Sound Reason:

I strongly object to this proposal on the grounds of A. The increased traffic and noise pollution which will be generated. We are currently about half way through gas repair works at one of the key crossroads in west vale and at all times of the day traffic heavily builds up. This is an indication of how congested the area will become on a daily basis. At the other West Vale crossroads turning from the Elland direction towards Halifax is already difficult sometimes with just one car moving through the lights in time and this

goes on to strain the rest of the road network. I believe it was considered a few years ago that it wouldn't be possible for a second filter lane to be created to ease congestion so this will be something which will only become an even greater problem. B. The newly generated traffic from the proposed site could lead to Sunnybank road becoming a rat run as commuters use it to avoid one set of traffic lights on the way to Halifax. C. Our current Schools are already at full capacity, how will it they handle the increased population? Our current schools cannot surely handle this increase. Greetland on its own is only a small village and cannot be expected to cope with this. D. The lower grounds of the village are very well known to become flooded during spells of bad weather. This has been well publicised this month alone. Removing much needed green belt land will no doubt push the problem elsewhere. We need the open fields to soak up excess rainfall and act as a natural flood defence system. Tarmaced housing estates in its place will lead to catastrophic consequences in this situation. E. The area has current derelict brown field sites. Why cannot these be considered as potential sites which will improve the area and in turn save our green belt land.

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

Duty to Co-operate Reason:

I strongly object to this proposal on the grounds of A. The increased traffic and noise pollution which will be generated. We are currently about half way through gas repair works at one of the key crossroads in west vale and at all times of the day traffic heavily builds up. This is an indication of how congested the area will become on a daily basis. At the other West Vale crossroads turning from the Elland direction towards Halifax is already difficult sometimes with just one car moving through the lights in time and this goes on to strain the rest of the road network. I believe it was considered a few years ago that it wouldn't be possible for a second filter lane to be created to ease congestion so this will be something which will only become an even greater problem. B. The newly generated traffic from the proposed site could lead to Sunnybank road becoming a rat run as commuters use it to avoid one set of traffic lights on the way to Halifax. C. Our current Schools are already at full capacity, how will it they handle the increased population? Our current schools cannot surely handle this increase. Greetland on its own is only a small village and cannot be expected to cope with this. D. The lower grounds of the village are very well known to become flooded during spells of bad weather. This has been well publicised this month alone. Removing much needed green belt land will no doubt push the problem elsewhere. We need the open fields to soak up excess rainfall and act as a natural flood defence system. Tarmaced housing estates in its place will lead to catastrophic consequences in this situation. E. The area has current derelict brown field sites. Why cannot these be considered as potential sites which will improve the area and in turn save our green belt land.

Suggested Modifications:

We are currently about half way through gas repair works at one of the key crossroads in west vale and at all times of the day traffic heavily builds up. This is an indication of how congested the area will become on a daily basis. At the other West Vale crossroads turning from the Elland direction towards Halifax is already difficult sometimes with just one car moving through the lights in time and this goes on to strain the rest of the road network. I believe it was considered a few years ago that it wouldn't be possible for a second filter lane to be created to ease congestion so this will be something which will only become an even greater problem. B. The newly generated traffic from the proposed site could lead to Sunnybank road becoming a rat run as commuters use it to avoid one set of traffic lights on the way to Halifax. C. Our current Schools are already at full capacity, how will it they handle the increased population? Our current schools cannot surely handle this increase. Greetland on its own is only a small village and cannot be expected to cope with this. D. The lower grounds of the village are very well known to become flooded during spells of bad weather. This has been well publicised this month alone. Removing much needed green belt land will no doubt push the problem elsewhere. We need the open fields to soak up excess rainfall and act as a natural

flood defence system. Tarmaced housing estates in its place will lead to catastrophic consequences in this situation. E. The area has current derelict brown field sites. Why cannot these be considered as potential sites which will improve the area and in turn save our green belt land.

Comments:

Additional Evidence Link:

Comment ID **HRU1427**

Site ref (if applicable): **LP1625**

Person ID: **1243841**

Name: **Mrs Helen O'Hara**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The duty to cooperate has not been complied with (see below). The consultation process has not been publicised by the council to local residents in a timely and efficient manner. The NPPF has been largely ignored. The Sustainability Appraisals for sites LP0026, LP0952, LP0177 & LP1625 have not been prepared properly and too many questions remain unanswered.

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

Sound Reason:

The Housing Requirement is overstated in the Local Plan. The housing requirement calculated in the Calderdale Local plan is significantly overstated. The Council relies on the Report of Turley: 'Modelling the Economic Implications of the Proposed Housing Requirement'. This report is unsound. It projects that Calderdale will create a significant number of jobs over the next 15 years, these jobs need workers to fill them and the workers themselves will of course need homes. The resulting projected housing requirement is incorporated in the Local Plan. We are told the jobs will be filled by migrants etc and Turley advise that Calderdale will experience migration numbers above the historical average. Turley relies on data from 2014 which is before a referendum on the UK's EU membership was even contemplated. The historical average relied upon by Turley includes migration as a result of the UK being an EU member state and its participation in the EU's core principle of free movement of people. The EU is an economic trade block with a population of circa 400,000,000 people which now the UK is no longer part of. Free movement of people ends in December 2020, access to workers will be significantly reduced as a result. In any case, according to migration watch net migration into the UK has fallen since 2015: : [www.migrationwatchuk.org/statistics-net-migration-statistics](http://www.migrationwatchuk.org/statistics-net-migration-statistics). The ONS figures confirm that UK birth rates are falling. The UK's demographic is changing, there are more retired people in the population, less workers. Even if Calderdale experiences migration at levels at the historical average, there will not be enough workers to fulfil Calderdale's unrealistic economic aims. It is only by unrealistically projecting migration levels above the historical average that the plan can be taken seriously. Turley's methodology is flawed, all the objective data tells us that migration levels will drop. In addition, Government is introducing a point based immigration system and low skilled workers will face difficulties in obtaining visas according to the Home Secretary, Priti Patel (The Times 20/02/2020). There is already a national shortage of workers. there will not be enough workers to fill the homes Calderdale wants to plan for, therefore the plan is unsound. The council got its maths wrong when the first incarnation of this plan was submitted to the inspector, hence the need for more sites to be allocated now. This is evidence in itself that the council is

unable to properly plan and strategise. (UN)Sustainability. Calderdale Council has prepared sustainability report for this site. The report is unsound. The sites are rated on a traffic light system Green (Positive), Red (Negative) & Yellow (Uncertain). For 'uncertain' please read: WE DO NOT KNOW WHAT WILL HAPPEN. This site, LP0952, has been assessed against 17 Objectives and the results are: 1 x n/a 4x positive 1x negative 11x uncertain The Council does not know the answer to 11 of the 16 objectives which relate to this site. That's 68.75% of the objectives being uncertain. This is not good enough, the council is promoting the development on land when it does not know what the impact of that development will be. The answer should never be 'uncertain' more questions should be asked until an answer, be it positive or negative, is arrived at. E.G. This is a proposed residential housing site - it will remove Green Belt. Objective 11 'TO PROTECT AND ENHANCE THE NATURAL, SEMI NATURAL AND MAN MADE LANDSCAPE' should be deemed as a negative. This is unacceptable. The plan is unsustainable. There are too many unknowns for this site.

Flooding The Black Brook river flows to the south of this sloping green belt site. The Calder Valley and Calderdale generally experience significant flooding regularly and a reported Â£40M has been spent in attempts to mitigate these issues without success: See Storm Ciara/Mytholmroyd This site acts as a natural water tank holding countless gallons of rainfall and releasing it predictably and slowly into the Black Brook. If this land is built upon it will increase surface run off, increase water transit speeds and increase peak water volumes in the Black Brook itself. West Vale, Elland and Brighouse will flood. George Eustice MP, the DEFRA Secretary wishes to encourage the use of natural flood mitigation techniques and to retain natural flood plains to reduce peak river flows: Speaking on BBC Radio 5L 22/02/2020 at 08:08 hrs. This plan goes against the aims of the NPPF at paragraphs 155 & 163 and elsewhere. It is also against national policy as described by George Eustice MP. Mitigation measures will not succeed. This land is unsuitable for development. Green Belt Chapter 13 NPPF deals with Green Belt planning policy and has not been followed by Calderdale Council. Brownfield sites should be considered first although Calderdale Council does not appear to have considered any Brownfield sites. There is no Brownfield register available see para 119 of the NPPF. There are countless Brownfield sites within Calderdale which are suitable for housing. The council has failed to demonstrate that Exceptional Circumstances exist so as to develop the Green Belt at this site. I attach a Green Belt Site Survey Form for this site which demonstrates that the land performs a valuable function in its existing state. The revisions to the plan represent further unsustainable development with a disproportionate amount of new homes proposed across four sites in Greetland with 1041 additional units of the 1708 on new housing sites (over 60%) proposed in the Elland area. The function of the planning system is to facilitate sustainable development that makes a positive contribution to the environment. It is not the role of the Council to release demonstrably unacceptable sites within the Green Belt to meet a housing target! The Inspectors letter of 16 July 2019 to the Council notes (Para 14) that "local plans should meet objectively assessed needs unless adverse impacts of doing so would significantly and demonstrably outweigh the benefits" this is exactly the case in Calderdale. Later, where the Inspector asked the council to review the option of 'the supply of more suitable and available sites elsewhere', however, the further work on the additional sites considered (incorrectly by the Council) to be 'suitable and available' are not, in fact, suitable or available, and in any case it has been revealed that this option is simply not sustainable.

Housing Densities within the Local Plan If Calderdale increased housing densities elsewhere in the plan this site would not be required. The Brighouse housing densities are unsustainable and are not an 'Effective use of Land' per Chapter 11 NPPF. Densities should be increased in the Brighouse allocations to save this site see NPPF paragraphs 122 & 123

Infrastructure All 4 sites, 600 houses, lie alongside 1 main road, Saddleworth Road. The side roads are very narrow most of them being single track. Peak traffic times see cars queuing up Saddleworth Road attempting to pass through the junction at West Vale. This junction is currently over 100% on volume to capacity ratio (reference Parsons Brinckerhoff report Calderdale Local Plan Transport Modelling). The road network could not cope with a further 1200 cars.

Air Pollution 'Lets Clear the Air' This is the slogan used by Calderdale Council. No air quality has been carried out at West Vale junction. Saddleworth Road has a pre school and a primary school at its side. The children are aged 30 months to 7 years old. They are subjected to the standing traffic all day, every day. Their little bodies are closer to the ground and they breathe a lot quicker than we do.

We are seeing evidence of air pollution on developing brains and asthma. They need us to stand up and be their voice! The homes proposed are 4/5 bedroom executive homes. They will not be people catching the local bus to Halifax for work they are Leeds and Manchester commuters. This is not sustainable development. Wildlife This site is a wildlife corridor and building on it would have an unacceptable effect on local habitat etc.

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

Duty to Co-operate Reason:

Calderdale Council knows that there is a significant flood risk in its borough. This is not true of neighbouring authorities, Calderdale should partner with ALL neighbouring authorities to transfer some of the housing need to those neighbouring Authorities. Calderdale has not done this.

Suggested Modifications:

Remove LP0952, LP1625, LP0177 & LP0026 from the local plan. Densities should be increased elsewhere to free up up these sites. The economic model should be revisited.

Comments:

Additional Evidence Link:

Comment ID **HRU1436**

Site ref (if applicable): **LP1625**

Person ID: **1243994**

Name: **Mrs Ross Hallam**

Organisation:

Agent ID:

Name:

Organisation:

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 development represents intrusion into the green belt, loss of green space, a threat to bio-diversity and, will contribute to local issues in respect of traffic congestion, flooding and air pollution. These impacts will be significantly exacerbated when considered alongside the other sites that have also been put forward (0026, 0177, 0952, 1625) and the cumulative of all these sites represents disproportionate allocation of housing for this area. The justification for which appears to be reliant on the Greetland and Stainland ward being associated with Elland for the purpose of the local plan,. The links between these settlements are limited. The local infrastructure cannot cope with the likely level of intensification from developing these sites. The resulting traffic problems will cause extensive traffic congestion issues, compromise highway safety and impact air quality. The opportunities for improving infrastructure are limited and improvements outside the locality will do little to alleviate the issues. The intrusion into the green belt is unjustified and will significantly harm the character and setting of the locality. Flooding, the sites all experience varying degrees of flooding and given this is now such an issue, how can it be considered suitable to develop areas with a known flood risk. The sites have significant bio-diversity value that will be severely compromised by their development for housing. The need for additional housing is based on historically unprecedented economic growth. The plan places economic development to the

detriment of the local community and environment conflicting with the aims of sustainable development

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1437**

Site ref (if applicable): **L1625**

Person ID: **1243973**

Name: **Mrs Amy Hannah**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

All points below should be considered to apply to sites LP0026, LP0177, LP0952 and LP1625 and therefore these sites should equally be rejected from the Local plan. I would like to point out that plans LP0026 (The Gate Farm), LP0177 (Land adjacent Ellistones Place), LP0952 (Land at New Gate Farm) and LP1625 (Land to the west of Silverdale Terrace) should be considered as one and these are not separate proposals as they are so interrelated (sited within a small 1 km area along Saddleworth Road) that they can only be assessed fairly if considered as a whole. By splitting them out as separate plans the full picture is being concealed. The Local Plan does not address the implications of the National Planning Policy Framework, especially, NPPF Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. According to the NPPF Para 143 under 'Proposals affecting the Green Belt' it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' The very special circumstances do not apply. Other reasons not legally compliant. Poorly advertised and believe that residents of Greetland have not been made aware of the proposal and given opportunity to comment.

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

Sound Reason:

My main points of objection are as follows: Flooding issue This affects the whole area and is relevant to all sites in question. The land put forward is unsustainable. Further development will result in additional surface run off. This in turn will contribute to further flooding. The fields considered for development currently act as a natural flood defence and even without the further development they are unable to cope with absorbing heavy rainfall. We have seen the effect of this in recent weeks and it has resulted in severe flooding in the area, flooding of Black Brook at the bottom of these fields and into West Vale. In 2015, the Boxing day Floods demonstrated this at its worst. Clearly, building more houses on these fields will cause major issue contributing to further more serious flooding. Calderdale council therefore have a duty of care to comply with current policy and legislation on flooding and they should remove these fields from the Local Plan. Para 155 of the NPPF states that 'Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas of highest risk (whether existing or future). Where

development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere ' Effect on Greenbelt Land The NPPF at a para 133 states that -“ The Government attaches great importance to Green Belts ”and at para 136 that -“Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified”At para 144 it further states -“ local planning authorities should ensure that substantial weight is given to any harm to the green belt”and at para 145 -“ a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt ”Building on these sites is contradictory to all of these statements. If considering all of the sites as one as we should be doing, the development would mean a large and disproportionate amount of land and open space would be lost from this small community. This also includes the loss of public amenity, wildlife habitats (foxes, badgers, bats, rabbits, deer, birds of prey), loss of green space, loss of wildlife corridor, loss of public footpaths and the creation of urban sprawl. I believe such loss associated with Greenbelt will contribute to affecting our community's wellbeing and mental health in a negative way. The Greenbelt is free for the community to use and greatly benefits the vast majority of residents who utilise this on a daily basis. The land is a quiet, safe and therapeutic environment and is the centre of our community. To lose all this would be devastating. Increased air pollution The proposed plans would obviously create more air pollution due to more houses, more people and more cars. The single biggest air polluter is traffic, or road vehicles. More people die of air pollution than Malaria and HIV, this should be a consideration when looking at these proposed plans to develop on such disproportionate scales. The Clean Air Strategy 2018 states that - While we need to ensure economic growth, we also need to realise the 'cost of air pollution on health'. Infrastructure The increase in houses at this capacity will add a huge pressure to already full schools in the area. The schools are not big enough to cope with this amount of new housing. The doctor's surgery is also full and already struggles to cope with the number of patients and appointment requests. The NHS dentists have long waiting lists without further increase to residents. There is one main road which runs through the proposed area which would not be sustainable for such an increase in traffic as a result of the development. The existing sewage system and drainage cannot cope with the current volume and with the rain water seen in recent times and in past years has caused the raw sewage to overflow into the footpaths and fields in the area. This problem would only increase with further development. Traffic congestion and noise pollution Greetland and West Vale already suffer chronic traffic congestion, The village is already at breaking point at peak times and the roads cannot cope with the existing volume of traffic, let alone adding to that with these proposed developments. At school drop off times Saddleworth Road becomes a single lane road due to the parked cars on both sides.It becomes an obstacle course to get through and the large lorries that frequent the area make it dangerous for road users and pedestrians. I fear for the lives of the children trying to get to school daily..

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

Duty to Co-operate Reason:

Suggested Modifications:

Do not build any of the proposed housing in the Local Plan on our greenbelt land.

Comments:

Additional Evidence Link:

Comment ID **HRU1447**

Site ref (if applicable):

Person ID: **1243996**

Name: **Mr Gethin Jones**

Organisation:



Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Green Belt: As stated in NPPF: -“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.” (NPPF, Para 133, 2019) -“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” | ..makes as much use as possible of suitable brownfield sites and underutilised land.” (NPPF, Para 136-137, 2019) The Local Plan has failed to examine fully all other reasonable options and has failed to provide a compelling argument for exceptional circumstances.

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

Sound Reason:

Planned developments have to be proportionate to the size of our existing settlements. Infrastructure planning specifically in relation to healthcare needs to be prospective rather than retrospective. I have significant concerns with the lack of specific plans in relation to healthcare provision in the area given the extent of the proposed developments. Sites LP26, LP177, LP953 and LP1625 are in very close proximity and as such my comments are to be considered for all these sites given their cumulative impact on the local area. Rather conveniently, in their evidence submissions, Calderdale council have chosen to disguise the disproportionate development in the Greetland area by combining it with areas where there is less significant development planned. (Elland, Stainland and Holywell Green). The quoted figure of 8.21% growth in the number of dwellings cannot be used as a reference when considering the effect on the local infrastructure. The Calderdale Review of Polling Districts in 2019 states that there are 1726 dwellings in the Greetland and Sunnybank wards. The above named development propose 543 new dwellings in these wards giving a staggering percentage increase of 31.4%. This clearly represents a disproportionate increase in the area. Report CC37 details a previously proposed development site which was considered and rejected in neighbouring Barkisland due to a "disproportionate increase to Barkisland village". This represented a 16.6% growth in dwellings. Questions must be asked about the boundaries used by Calderdale Council when calculating their growth percentage in Greetland. As a healthcare professional working in primary care in Calderdale I have significant concerns with the clear lack of infrastructure planning in the local plan generally, especially in relation to healthcare provision. The -“Health and Wellbeing Infrastructure Supporting Paper” submitted as evidence is somewhat inadequate as reassurance that there is any meaningful plan to address the concerns of the local community in relation to healthcare access given the disproportionate increase in population planned. This is summarised well in its conclusion: -“The Local Plan has been prepared at a time of significant change to the delivery of health and social care. These changes are yet to embed themselves and as such it is not possible at the present time to provide a finalised position on the physical health and wellbeing infrastructure that will need to be delivered...” This is not an adequate plan. This conclusion does not satisfy national policy nor NHS Policy statements: The National Planning Policy Framework specifically requires councils to -“take into account and support the delivery of local strategies to improve health, social and cultural wellbeing at the local plan stage.” (NPPF, 2019) -“Embedding well-evidenced health priorities into the local plan is a powerful way for the NHS and public health to empower planners to create healthier places.” (Putting Health into Place, NHS England 2019) Furthermore, rather worryingly there is no mention at all in the -“Health and Wellbeing Infrastructure Supporting Paper” about any plans regarding frontline NHS services not under the control

of the CCG, specifically dentistry. The local NHS dental service is already oversubscribed and inadequate for the needs of the existing population. An NHS Choices search conducted in January 2020 showed no dental surgeries accepting new patients in a 10 mile radius of the proposed developments. There is no evidence of any consultation with local providers or NHS England in this regard. This is a missed opportunity to identify a strategy to address inequalities in access to healthcare in our area. A 31.4% increase in dwellings in an area serviced by 1 dental practice would cause an access crisis with resulting impacts on the local GP surgery and A&E department. In conclusion. The percentage increase in dwellings has been misrepresented in the figures submitted. The potential impact of the true 31.4% increase in the area or Greetland would be catastrophic.

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

Duty to Co-operate Reason:

Suggested Modifications:

Remove site from local plan as unjustified development on Greenbelt land with no exceptional circumstances. Properly assess the impact of a 31.4% increase in dwellings in Greetland. Provide meaningful plans on healthcare provision for such a population increase.

Comments:

Additional Evidence Link:

Comment ID **HRU1457**

Site ref (if applicable): **LP1625**

Person ID: **1243972**

Name: **Miss Stephanie Ashton**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Questions concerning the figures surrounding the housing requirement Inadequate sustainability appraisal  
Removal of open green space Lack of supporting infrastructure Air Pollution not assessed, therefore  
unknown Lack of traffic plan and operational assessment of local road network Disproportionate amount  
of development

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

Sound Reason:

Questions concerning the figures surrounding the housing requirement: The Objectively Assessed Need for housing that the council relies on to make population predictions is based on out of date information, and therefore must be questioned. In addition to this, the council's estimations for annual job growth assumes that Calderdale will experience rapid and constant growth. This is not realistic and has the effect of raising the housing requirement in such a way that it becomes harmful and unsustainable. In 2016 the WYCA (West Yorkshire Combined Authority) published its Strategic Economic Plan to cover employment growth for the Leeds City region to cover the period up to 2036. They estimated 35,700 net additional jobs in that time. In part, it is these figures that Calderdale have based their projected employment growth on, however, the Leeds City region has produced below average employment over the past 30 years but in

their Strategic Economic Plan they envisage well above average growth in the next 15 years. This is extremely optimistic given that the current unemployment rate in Yorkshire is 4.3% which is the second highest of any region in the UK and is currently increasing. In their economic projections, Calderdale are hoping that the 'Northern Powerhouse' (which doesn't actually exist except on paper) and HS2 (although how?) will generate historically unprecedented rates of employment growth. This forecast means that Calderdale will miraculously go from below average employment growth to significantly above average growth. Calderdale need to revisit their economic forecast which is based on the assumption that our economy will grow because of the effect of the Northern Powerhouse which is not evidenced in any way. And because they have over-egged the economic growth, Calderdale need to find more land to build on. If their economic growth was more realistic, there would be no need to build the extra houses.

**Traffic and Air Quality:** There is no mention of road traffic constraints at the West Vale traffic lights. However, as someone who lives in the area, I am obliged to inform the inspector that the level of congestion at the traffic lights has backed up as far back as the primary school at times. This is a considerable level of congestion, one that is currently unmanaged, and that is before an additional 600 homes are allowed to increase the level of traffic. We could face between two to four extra cars on the road, per house, considering that each home will likely have two persons traveling to work, some as many as four if the homes house a younger generation of workers still living with parents. In our home, we have four people all driving cars to and from work. This isn't just a high number I am making up; the situation is the same with many of my friends too. I mention this point because it is of genuine concern to me, the traffic is terribly backed up behind the West Vale traffic lights, and there is no mention of air pollution being monitored in this area. This directly affects the local primary school, situated on Saddleworth Road. As a primary school teacher, myself, the thought of such an increase in traffic on Saddleworth Road terrifies me. The school children will be put at an unacceptably higher risk, both from road traffic accidents and air pollution. To pass any development on this road, due to the impact it will have on vulnerable children, without proper testing and assessment is not right. As a teacher, I am concerned with child development, even without testing and assessment it is not an unjustifiable statement to say that the levels of air pollution on this road, with such an increase in traffic, will dramatically increase air pollution. The harm caused by air pollution will further increase due to the way in which Saddleworth road is set in the bottom of the valley and is not surrounded by open space, this has the effect of trapping and concentrating the air pollution. At times when congestion is at its worst, the children of Greetland are walking to school, close to the ground, due to their height, this is where pollution from traffic is at its highest levels of concentration. I am worried for the health and cognitive development of the children of Greetland, should this development be passed. How can we justify the complete lack of attention this issue has received? I was present at the Greetland Pressure Group protest outside of the Town Hall. The children themselves were protesting in pollution masks and they waved homemade flags that read poison the children, poison the future. The effects of this development may well be felt in economic terms in years to come, in the form of a workforce that was denied the opportunity to reach their potential, due to the poisonous air they had no choice but to breathe.

**Flood Risk** The NPPF states that planning policies and decisions should promote public safety and take into account wider security and defence requirements by: a) anticipating and addressing possible malicious threats and natural hazards... This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.' To increase the chances of flooding to existing property by building on this highly sensitive land is against NPPF policy, and this land should not have been put back into the Local Plan. This land was previously removed due to the way in which it floods. Flooding is already a more prevalent risk due to climate change, to remove the sloping grasslands that currently have a crucial role in preventing further devastation to the area due to flooding is unsustainable and against NPPF policy. The land acts as a sponge soaking up water. No sufficient mitigation has been referred to anywhere in the Local Plan regarding this high-risk flood area. Both Local and regional press have reported on the flooding

that took place on this land during the consultation period of the Local Plan. The community, Calderdale and the whole of Yorkshire have been made aware of the issues we face concerning flooding, in this small area of a small village in Calderdale. The floods here are news worthy. To build here is totally unsustainable. To suggest that the issues we face concerning flooding can be mitigated against is totally unsubstantiated, and not realistic. It is not a small amount of water that the land here has to deal with. There is far less sensitive land available in Calderdale. The area must not be put at risk because the Local Plan had to be put together in a hurry, and with out of date economic growth figures.

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

Duty to Co-operate Reason:

The consultation process is required to be simple and accessible. It is not.

Suggested Modifications:

Remove this land from the Local Plan

Comments:

Additional Evidence Link:

Comment ID **HRU1459**

Site ref (if applicable): **LP1625**

Person ID: **1243998**

Name: **Mrs A Hemsworth**

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:

Sustainable Development I believe that the council has not fully considered brown-field sites, and that the council should not be put under pressure from house builders who prefer the 'easier' option of greenfield sites. The plans for this site are not sustainable. Your data shows that Greetland has been combined with Elland, and therefore the figures show a distorted image. In reality, houses on this site (as part of over 600 new homes) is disproportionate to the size of the village of Greetland and would significantly alter the semi rural nature of our existing community. Green Belt This land is designated as Green Belt land and as such prevents urban sprawl. What are the exceptional circumstances for building on this land? You do not provide any evidence! Flooding This site does NOT meet the National Policy with regard to flooding. The land to the south of Saddleworth road, provides an area for excess rainfall to settle, soak and drain away into Black Brook, which then flows in to the River Calder at West Vale. There are layers of clay in the Greetland hillside, and there are many springs as a result. Water drains through the millstone grit and off the hillside and moors above, following a complex drainage system of springs, streams, old mill dams and wells, which slow the flow of the water. This land is not suitable for housing due to the high water table. We must let the water soak away naturally and NOT add to the already devastating floods experienced in Elland and further down the valley. Our weather systems are changing and what was once considered to be a 'once in a 100 year flooding event' is now happening every few years. Traffic; With over 600 houses

proposed in total, there would be a potential 1200 extra cars on Saddleworth Road. There is already chronic congestion at the two (unavoidable) junctions in West Vale which causes traffic to back-up through the local villages of Greetland and Holywell Green and any extra traffic would cause massive tail backs ; WSP Parsons Brinckerhoff Report on Transport Network states that: traffic congestion at the juncture of Stainland Road-Saddleworth Road would increase by approximately 105%, and that traffic congestion at the juncture of Stainland Road-Rochdale Road would increase by over 100%. Air Pollution - Unfortunately, cars are often queueing for the west vale traffic lights right outside the junior school on Saddleworth Road. This proposed development will cause considerably more pollution, allowing toxic air to compromise the health of vulnerable developing children , stunting lung growth and causing life-long health problems. The pollution caused will affect all the residents of our village, and surely this goes against the Calderdale Council's own Air Quality Action Plan and the West Yorkshire Low Emissions Strategy. Infrastructure ; The infrastructure of the area cannot support the extra households for this site , never mind the 600 households if the whole of the proposed development s are approved. We have no extra capacity in the school ; Calderdale council's own figures show that a further 206 school places would be required. The GP surgery could not cope with an extra 600 families, and the NHS dentist already has a waiting list . Ecology ; This area serves as a green corridor between the villages of Greetland, Stainland, and Barkisland. The proposed building works will affect the ecology of the valley by:- increasing air pollution, noise pollution , and artificial light pollution; and by creating overbearing buildings and oppressive human presence . Open Space ; This amenity has many benefits ; it is good for our mental and physical well-being , and the footpaths in this area are well used by families, dog-walkers, bird watchers etc. The Local Neighbourhood Plan Committee recently commissioned a report as part of their programme to preserve and retain Green Spaces for the Health and Wellbeing of all local people.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU146**

Site ref (if applicable): **LP1625**

Person ID: **1239027**

Name: **Mr Nigel Duckworth**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

1) The current policy and legislation on flooding states -“due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in high flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere” - In the Calderdale Boxing Day Floods 2015 the field LP0177EllistonesPlaceSaddleworthRoad,Greetlandsuffered severe flooding. Any building on this land would cause flooding and therefore does not comply withcurrentflooding policy and legislation as outlined above. Calderdale Council Planning Department has a legal responsibility to comply with current policy and

legislation on flooding. These fields are a natural and essential soak off and any building on this land would further increase the flooding in this high risk flood area. 2) I draw your attention to Esther McVey, Housing Minister's written policy on Green Belt land.; - "Of course one of the most important environmental safeguards we have is the Green Belt. And I want to be clear that our commitment to this is as strong as ever, with any changes only happening in exceptional circumstances ; protecting the Green Belt goes beyond protection against development" - Esther McVey has provided Â£2 million pounds for Councils to employ Enforcement Officers to prevent Green Belt land being built illegally and Calderdale Council is listed as one of the Councils who is a recipient. The Enforcement Officer's role is to ensure "unscrupulous developers" do not apply pressure on Councils to build on the Green Belt and not the available brown field sites because "developers don't want to build on brown fields sites". - Horsfall Mill is an ideal brown field site and meets the demographics of the area perfectly and complies with the NPPF government policy of - "building the right houses in the right places" - Exceptional circumstances in The Government White Paper - "Fixing our Broken Housing Market" - Parag 1.39 states that: The Government wants to retain the high bar to ensure the Green Belt remains protected, but we also wish to be transparent about what this means in practice so that local communities can hold their councils to account therefore we propose to amend and add to the National Policy to make it clear that: authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including :- making effective use of suitable brownfield sites (Calderdale Council has not adhered to this with regard to Horsfall Mill, West Vale) and the opportunities offered by state regeneration :- I refer to the Judicial Review - Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council (2015) EWHC 1078 (Admin), Jay J - where Richard Turney appeared for the claimant "Mr Turney ... submitted that the fact that a particular site happens to be suitable for housing development cannot, without more, constitute an exceptional circumstance justifying an alteration of the Green Belt. I agree with Mr Turney insofar as this goes..Suitability simpliciter cannot logically be envisaged as an exceptional circumstances". - This land is classified as "highly sensitive green belt" on the Local Plan and there is no legal justification for building on this land. It is not legal to classify Green Belt as greenfield on the Local Plan ; they are totally different and your own tests states all the Green Belt land identified on Saddleworth Road in the Local Plan for building meets the five test and therefore you have no legal right to change this classification. I question the legality of Greetland being placed in with Elland on the Local Plan; Greetland is a small village in the Greetland/Stainland Ward HX4 whereas Elland is a town HX5 ward. This is false representation and when you look at the building volume within this area of approximately ½ a mile in this small village taking out the whole of the Green Belt land on the south side of Saddleworth Road this will totally change the nature / look and the openness of the village and is a prime case of urban sprawl. Mr Justice Jay in the Calverton Parish Council v Greater Nottingham Councils [2015] EWHC 1078 stated that:- - "it would be illogical, and circular, to conclude that the existence of an objectively assessed [housing] need could, without more, be sufficient to amount to - "exceptional circumstances" within the meaning of paragraph 83 of the NPPF" - R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCACiv404, Treacy, Underhill, Lindblom LJ - "The concept of - "openness" here means the state of being free from built development, the absence of buildings ; as distinct from the absence of visual impact" [7] Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council [2015] EWHC 1078 (Admin), Jay J

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

Sound Reason:

Horsfall Mill, West Vale is ideally located for affordable, good quality housing; it would not change the nature or look of the village and is perfectly located for young first time buyers to access the many amenities / leisure facilities without the need for a car. The Calderdale Plan targets for housing as we have now come out of the European Union the housing volume should be less resulting in a much lower housing

target and reduce the need to release the Green Belt sites in Greetland. The NPPF sets out the aim of Green Belt policy which is - "to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence." (NPPF 179). Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: (i) to check the unrestricted sprawl of large built-up areas (ii) to prevent neighbouring towns merging into one another (iii) to assist in safeguarding the countryside from encroachment (iv) to preserve the setting and special character of historic towns (v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The Council, in its own evidence, concludes that the overall parcel within which the site is located performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt but, most decisively, would see the coalescence of Greetland and West Vale and the deterioration of the identity of both places undermining the Council's Settlement Hierarchy. Notwithstanding this, the quantum of housing proposed in and around the site is undeliverable during a single plan period in plan-making terms and unsustainable in infrastructure terms in relation to the capacity of existing highways, schools and local services. Accordingly, these sites on Saddleworth Road in the existing Green Belt should be removed from the Plan as the exceptional circumstances for their release does not exist. Furthermore the proposed sites do not meet national policy with regards to flooding. Clean Air Policy ; even higher numbers of traffic would cause further pollution in what is already a bottleneck area of high congestion. And be detrimental to the health of the toddlers / young children at Sunny Bank Nursery / Pre-School whose playground is situated approximately 3 feet from this very busy main road (picture attached of congestion down this road). Saddleworth Road services many areas i.e. Barkisland, Ripponden, Norland and other outline districts and heavy goods vehicles regularly use this road e.g. Sonoco; these are high pollutant diesel vehicles and evidence shows particles of pollution fall lower to the ground making small children more vulnerable.

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

Duty to Co-operate Reason:

To built on the Green Belt sites proposed in the Local Plan would totally change the nature / look and openness of the village in a very detrimental way to both residents and wildlife in this wildlife corridor whilst also being illegal due to the flooding and protected Green Belt policy in the NPPF.

Suggested Modifications:

N/A

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5595373>

Comment ID **HRU1461**

Site ref (if applicable): **LP1625**

Person ID: **1243885**

Name: **mrs victoria travis**

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 plan to be sound for the following reasons; Greenbelt NPPR states greenbelt development should demonstrate exceptional circumstances. The site assessment report and sustainability appraisal report does not demonstrate any exceptional circumstances. Brown field site should be exhausted. A site on Saddleworth road in Greetland has just come up for sale. An allowance for brown field windfall sites should be included in the Local plan due to Calderdale manufacturing heritage, Optimising the density of development in other areas. Can other sites have that have already been allocated for development have their density increased? The Turley 2019 report makes no mention of discussion with neighbouring authorities to see if they could accommodate some of the housing needs. This could part of the Leeds City region approach. This site is classed as highly sensitive greenbelt and grade 3 agricultural land. Development of this site would result in loss of openness. Air Quality In 2019 Calderdale council announced a climate emergency. -“We cannot solve the air quality issue alone, everyone has a role to play. With Let's Clear The Air we are asking residents to take action of their own. This includes more sustainable travel choices, where possible -“ Building houses on Green belt land on sites with no proposed infrastructure, where car travel is inevitable will greatly reduce air quality. Development of this site would result in damage to the environment as new resident would be heavenly dependent it is over 2km to the train station. Flooding The fields have valuable use as a water storage area reducing surface run off and increasing lag time. Development would result in flooding issues further down the water course. Sustainability appraisal report Firstly it should only be a positive or a negative outcome. 9 uncertain responses out of 17 on a sustainability report, this means the majority of answers are uncertain the document. Infrastructure Policy on plus transport. There is no infrastructure planned for Greetland. There is a train station planned for Elland I first heard of this 20 years ago! If the elusive station is supplied there is the obstacle of West Vale which all residence must travel though. WSP Parsons Brinckerhoff Report on Transport Network states that, "¢ This report identifies that traffic congestion at the junction of Stainland Road-Saddleworth Road would increase by approximately 105% "¢ This report also identifies that traffic congestion at the juncture of Stainland Road-Rochdale Road would increase by over 100% It is simply not fair to increase a village by 600 houses and offer no infrastructure. PLEASE NOTE GREETLAND IS NOT IN ELLAND. No regard for extra school places as the NPPF suggests there should be. An error in the site assessment summary is journey time to Town 15 minutes. This is backed up in the site assessment reports, journey time to hospital 30 to 60 minutes. The hospital is located on the journey into Town before the Town centre is reached. Therefore the journey time to town is 30-60 mites too. Wildlife habitat will be lost.

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

Duty to Co-operate Reason:

Suggested Modifications:

Remove site from the Local Plan

Comments:

Additional Evidence Link:

Comment ID **HRU1476**

Site ref (if applicable): **LP1625**

Person ID: **1243991**

Name: **Mrs Diane Kershaw**

Organisation:



Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Objection by Diane Kershaw ; 23 February 2020 I am writing to register my objection to part of Site LP0177, which I believe, lies within flood zone 3A ; the highest classification of flood risk. Preventative Measures Has an Environmental Agency Scientist been employed to measure river flow, how fast Black Brook floods and whether its banks are eroding in order to protect the surrounding area and ultimately West Vale further downstream? Have Hydrologists studied the flood plain in its original state compared to when there are heavy floods? If the development goes ahead, the area will have less capacity to absorb the rainfall. It is normal in very wet weather for the fields to absorb the water like a giant sponge subsequently releasing it more slowly without overwhelming the water courses. If the green belt is covered in concrete and tarmac, the land has no capacity for retention, water will simply rush straight down with inevitable consequences. Could existing and future residents be reassured by the Inspector at Calderdale Council that every effort has been made to study the Environmental Agency's detailed reports? What plans have been put in place for the excess water go if development takes place? Another scenario which has hit the headlines many times and the area was visited recently by the Environmental Minister, is Mytholmroyd/Hebden Bridge. There is photographic evidence of flooding for well over 100 years and is still causing destruction. What has been learnt from this to prevent the same situation happening in Greetland/West Vale in the future? I have never heard of West Vale flooding and pray this does not happen in the future. Who is ultimately accountable for the flooding in Mytholmroyd and Hebden Bridge for over a century? We cannot sustain these 'rare' incidents which are now occurring many times in a decade! Who will be accountable when it's too late should the development in Greetland go ahead? Infrastructure What are Calderdale Council's plans for upgrading the infrastructure ie pre-schools, primary schools, doctor's surgeries, dentists and road network improvements to alleviate traffic congestion if the large housing development takes place? The air pollution is at a considerably high level at the moment and you can smell the exhaust fumes (see British Heart Foundation's report on our area). Toxic air potentially affects the normal electrical function of the heart and stays in the blood stream for at least 3 months! What impact does this have on children and parents walking to school now and in the future? The particularly congested roads in West Vale and Stainland Road leading to and from Greetland Academy and preschool, particularly at peak times, already causes a problem with parking and pedestrians are walking through pollution caused by the already excessive number of vehicles. Has anyone from Calderdale's Environment Department measured the pollution levels and can the Council's results be viewed anywhere online now or in the future please? Flooding Calderdale have declared a climate emergency and having records of the flood plain in its natural state over many years, I was shocked and surprised to learn of the proposed development in Greetland and in particular at the back of Woodfield Drive. Whilst walking in the area and viewing photographic evidence, particularly over the last month, the amount of flooding to the land and river in this area and its effect on home owners. With a greater risk of flooding, will residents and businesses be able to afford the inevitable increases in insurance premiums? 'Eye on Calderdale' document states that sometimes developers who are allowed to build on floodplain land are asked to contribute to the cost of flood protection measures as part of the planning process. Would this be put in place if the proposed development goes ahead? Also a quote from the Environment Agency, 12/2/20 Evening News, BBC Look North as follows, -"Unfortunately, the Calder valley is at unique flood risk. It's a very narrow steep sided valley and it doesn't take much to see flooding throughout the catchment right down through many communities. We see rapid onset flooding; low onset flooding as well and quite a high risk to life." Adrian Gill, Environment Agency. When a sudden high volume of water rushes down a water course, the force disturbs all kinds of debris taking it downstream potentially causing blockages and further flooding. Flooding also overwhelms the drains causing sewerage to spill out to the surface. This is not environmentally friendly and I assume that a Hydrologist, has assessed this? Will flood defences be put in

place if this development takes place? As well as Greetland, surely the proposed development would have detrimental implications for the residents in Calderdale ie. lower Greetland and West Vale. Costly work has to take place each time a large area floods. This causes disruption to roads causing traffic problems and this has an effect on pollution. The pollution issue would increase permanently if the proposal goes ahead. The cost to residents, shopkeepers and the Council in this area will be significant and some will be not be able to get insurance. The fields and meadows at the moment, absorb water like a giant sponge. When its pouring down with rain, it is important to find out how fast the river is flowing and if the river is flooding, whether its banks are being eroded in order to protect the houses, villages and ultimately West Vale from flooding. The Council's identified flooding implication of the proposed development in Greetland would have far reaching implications for the residents of Calderdale. During the Boxing Day Floods in 2015, Elland Bridge was destroyed and resulted in a very costly rebuild, a rebuild which took over a year, causing significant disruption to residents of Calderdale. Work is still undergoing on building flood defences in and around Mytholmroyd which did not prove successful during the recent floods in February 2020. The traffic problems we encountered, the effect on air pollution, the financial cost to the council as well as local businesses was a well talked about issue within the area. It was a disaster. Nothing has been done to make the flooding less serious in this particular area and water levels peaked again over the last few weeks. How much more can people cope with? The council has spent millions of pounds on flood defences, which does not seem to have any effect in areas in the Calder Valley. Work to prevent flooding is the Environmental Agency's responsibility. My husband and I regularly walk on the public right of way running the stretch of the proposed development and we have seen first-hand the extent of flooding in this part of Greetland. Homes on Woodfield Drive could be flooded due if this development takes place and will continue to affect insurance premiums, not only there but other areas. We need to think about people's quality of life the stress it causes not only the elderly but all concerned. Residents could have a bleak outlook now after living in beautiful and safe environment. The NPPF is clear that, -"Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk" Has the Council adhered to this policy? We need to think about the effect on birdlife such as Herons, Kestrels, Kingfishers which are seen and enjoyed in this area. Is there a report on the effect on agriculture and ecology should the proposed development go head. Public Right of Way My husband and I enjoy walks with our grandchildren along the public right of way which stretches along the development. The tranquil setting of this public amenity provides us with a space to exercise and have quality time in a fun, educational, safe environment. We all enjoy the abundance of wildlife in this area. The Council and residents have a duty to protect and enhance public rights of way and access within this area. The recreational value to the Black Brook area, which over 300 residents are trying to protect will lose its tranquillity and public right of way. It will become closed in and could become unsafe due to excessive flooding and damage in the future and could become unsafe for future home owners should these houses actually sell! There will be a long standing history of concerns logged against this proposal. The NPPF states that the Local Plan should create safe accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion. Traffic Issues and Air Pollution There is no mention of the drastic increase in traffic and air pollution within the plans for the proposed development. Traffic is already a problem during most part of the day with the traffic lights at West Vale, for many years, not coping with the amount of traffic. Calderdale are assessing the situation at the moment and I have no record of how long this has been ongoing. This is a major issue and is not revealed in the consultation document. Due to the existing issues West Vale faces with traffic congestion and presumed air pollution, a traffic report is required and operational assessment of local road networks. It seems to me that the land put forward for the Local Plan, in Greetland, has been done so without an operational assessment of the local road network. Again, if this has already been assessed, can the residents view the report on the outcome. I attach photographic evidence of the flooding at the back of the houses on Woodfield Drive for your attention. This sensitive area of green belt should be protected. I look forward to receiving a comprehensive report of the outcome of the objections made by all concerned.

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:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609804>

Comment ID **HRU1479**

Site ref (if applicable): **LP1625**

Person ID: **1243992**

Name: **Mr Vaughan Kershaw**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I am writing to register my objection to part of Site LP0625. Flooding The flooding implication of the proposed development in Greetland would have far reaching implications for the residents of Calderdale. I would like to draw the inspector's attention to the routine way in which this area of Calderdale experiences flooding, and the far-reaching ramifications this has on residents. Elland Bridge was destroyed in the Boxing Day floods of 2015. This resulted in a very costly rebuild, a rebuild which took over a year, causing significant disruption to residents of Calderdale. The traffic problems we encountered, the effect on air pollution, the financial cost to the council as well as local businesses was a well talked about issue within the area. It was a disaster. I was shocked to hear of the development proposed in Greetland, because anyone who knows the topography of the area knows what effects a development here will have in terms of how it will further add to the flooding issues we face in the immediate area and further downstream. I can find no reference to effective flood mitigation anywhere in the site reports. The council has spent millions of pounds on flood defences, which have not prevented flooding in other parts of Calderdale. Calderdale is prone to flooding. We regularly walk on the public right of way running the stretch of the proposed development, and we have seen first-hand the extent of flooding in this part of Greetland. When the homes on Woodfield Drive are flooded due to the development, this will affect insurance premiums for others too. The Council has identified the land as being at risk of flooding, the residents have provided proof of the extent of the flooding, there is no justification in land drainage terms to allow these sites to be developed. The NPPF is clear that, -"Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk" The council has not adhered to this policy. Part of Site LP0177 lies within flood zone 3A ; the highest classification of flood risk in terms of land that could potentially be considered appropriate for development. The zone 3A is immediately adjacent to the western and southern boundaries of Woodfield Drive. The land immediately adjacent to the whole southern boundary of 3 proposed allocation sites is also allocated as flood zone 3A. However, I ask the inspector to look at the photographs I have attached to my objection, as these provide a visual of how this land actually floods in reality. Whole fields become waterlogged, water flows on these fields at a considerable pace. Drystone walls act as dams, slowing down, but certainly not stopping the

huge volumes of water. These sites were previously removed from the plan. The council needs to look at new sites, not simply re-enter sites that have previously been removed for good, valid reasons. Sufficient testing has not taken place. Public Right of Way As I have mentioned in my comments regarding flooding, my wife and I regularly use the public right of way which stretches along the development. The tranquil setting of this public amenity provides us with a space to exercise in a clean, safe environment. Paragraph 98 of the NPPF clearly states that Planning policies and decisions should protect and enhance public rights of way and access. The site report for LP0177 acknowledges the importance of the recreational value of the Black Brook area, which residents of Calderdale would agree with, as was evident on the recent protest walk, which was covered by both local and regional press, both before and after the walk. Over 300 residents participated in the walk, even though it was held on the weekend of Storm Denis. If the proposed development is allowed to go ahead the residents of the immediate and surrounding areas will lose access to this public amenity as it will lose its tranquillity and be no longer fit for purpose as it will become closed in and unsafe to use. To close in the public right of way is in direct opposition with the National Planning Policy Framework. The NPPF states that the Local Plan should create safe accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion. Traffic Issues and Air Pollution The drastic increase in traffic and air pollution is not referenced under the constraints of this development. However, this is a very important constraint of the proposed development. The traffic lights at West Vale already experiences a considerable backlog of traffic. The pollution in the air can be tasted and smelt. I'm afraid I cannot provide you with a more scientific assessment, as the site report states that the cumulative traffic impact is being assessed. This is a major issue not disclosed in the consultation document. Due to the existing issues West Vale faces with traffic congestion and presumed air pollution, a traffic report is required, along with a Travel Plan and operational assessment of local road networks. The land put forward for the Local Plan, in Greetland, has been done so without an operational assessment of the local road network. Please acknowledge receipt of this objection.

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:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609807>

Comment ID **HRU1482**

Site ref (if applicable): **LP1625**

Person ID: **1243981**

Name: **Mr Michael Ashton**

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:

Flooding Paragraph 155 of the NPPF clearly states that, -“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk” In putting these sites forward the Council is ignoring the policy requirements of the Framework. The reports compiled by the Council for this site when putting together the Publication Draft version of the Local Plan in 2018 concluded that the site should be filtered (i.e. not taken forward as housing allocations) because of ; amongst other things ; flooding and drainage issues. Sequential and exceptions tests would have been necessary to demonstrate that the sites were suitable for and safe to develop. Although the Planning Inspector identified an insufficient supply of housing land following the Stage 1 examination process, it should not simply follow that additional sites are now allocated without a thorough assessment being made as to their suitability to counter the reasons why they were initially filtered. The three sites seem to have been put forward as a simple response to the Inspector's comments with no consideration of the flooding and drainage issues associated with the land. Green Belt The Green Belt Review was carried out in 2017, the reference numbers are 065 and 339. The conclusion of this review was that this site performed strongly in terms of their Green Belt function. The Green Belt Land is classed as Most Sensitive. Development of this site would result in the unrestricted sprawl of the large built up urban area of Greetland. The site assessment reports carried out ahead of the consultation on the Local Plan Publication Draft in 2018 concluded that the land represented the -“most sensitive Green Belt” Given this there is no planning policy justification to ignore that impact ; importantly carried out as part of a thorough Green Belt Review of the borough just over 2 years ago ; and now consider the sites suitable for allocation for housing. Such allocation would conflict with key purposes of including land in the Green Belt and would have a fundamental adverse impact on the openness of the Green Belt. We do not see that the council is able to substantiate their claim that the aspiration growth for Calderdale is achievable, as this would set an economically low achieving council as able to surpass the trends for economic growth seen nationally. There is no explanation for this. Calderdale will end up with a surplus of houses and a shortage of Green Belt land. Other Issues The site assessment reports carried out in advance of the 2018 Publication Draft identified other areas of policy conflict ; in particular heritage, open space and sustainability. It was at that time recommended that none of the sites should be allocated until an assessment had been made of the heritage impact. To our knowledge that has not occurred, as we see no evidence of this in the site reports. The sites were identified as providing valuable natural and semi-natural open space. This would be lost if the sites were allocated for housing. The land is particularly important to the residents of Greetland, which can be seen in the photos attached of the pressure group protest walk. The public right of way is used by the vast majority of the local residents, and even Calderdale residents from further away. This public amenity is highly important for the purposes it serves within the community, and should not be taken away or made unsafe to use, just to fulfil an unsubstantiated housing requirement. In terms of sustainability, a negative factor in not bringing the sites forward in the 2018 consultation was the distance to a railway station (in excess of 2kms). By definition that negative factor remains and forms part of the reason why other potential sites in the area have not been brought forward (such as site LP1089 on Rochdale Road). There are other sites within Calderdale as a whole that better fit the criteria of sustainability. Not all of the possibilities have been sufficiently explored. Conclusion All of the reasons why these sites were not brought forward at the Publication Draft stage remain just as relevant now. There has been no further assessment of any of the significant constraints which resulted in the sites being filtered at that stage. The only reason for bringing them forward for allocation now is based on a simple exercise of responding to a requirement to increase the housing supply. There is no justification for allocating these sites given the evidence of flooding, and given the fundamental conflict with the Green Belt Review in 2017. No consideration has been given to the potential to bring forward other sites in the area that do not carry these fundamental problems. No consideration has been given either to the lack of infrastructure available in Greetland to accommodate such a significant level of new housing. We hold great hope that upon being

presented with a more rounded view of the facts surrounding the development in Greetland, the inspector will be able to make a fair decision regarding this matter.

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

Duty to Co-operate Reason:

The process has not been simple or straight forward, as it is supposed to be. Finding information has been difficult, and I do not believe that all members of our community will have been able to partake in the consultation, which is not fair.

Suggested Modifications:

Remove this land from the Local Plan, and reassess the housing requirement. Alternatively, consider less sensitive, lower risklandelsewhere in Calderdale. It appears that Calderdale is allowing developers to dictate where they would most like to build houses based on house prices, or profit, rather than the sustainability of the land. We have been advised that the density of development could be increased in the more sustainable proposed development in the Brighouse area, as this would result in a decrease in the release of Most Sensitive Green Belt land, especially like the type of unsustainable land proposed for development in Greetland. In short, there are a number of different options to follow before this land should be even considered.

Comments:

Additional Evidence Link:

Comment ID **HRU1486**

Site ref (if applicable): **LP1625**

Person ID: **1243945**

Name: **Miss Jody Littleley**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Calderdale Council have failed to adequately ensure that residents effected were made aware of the proposals. Residents have not received any communication from Calderdale Council regarding these plans.

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

Sound Reason:

The Green Belt land should be preserved at all costs and should not be built on unless there are exceptional circumstances. Calderdale Council have not provided any evidence of exceptional circumstances. They say they want to build affordable housing - there are plenty of empty houses across Calderdale (how about these are filled first before thinking about building anymore), they are also plenty of non green belt sites that can be built on so build on those! The CPRE state "The development of brown fields sites should be a priority; there are more than enough brown field sites to fulfil the requirement without having to encroach onto Green Belt". This is not sustainable - there is not enough infrastructure to support the existing residents. Doctors surgeries, schools, dentists etc. are all full to capacity. The roads are incredibly busy - the traffic trying to get into West Vale via Rochdale Road, Saddleworth Road and Stainland Road is atrocious especially at peak times. The roads simply cannot cope with anymore cars.

These roads turn into car parks with traffic in West Vale back upped by Greetland Academy on Saddleworth road. I'd urge you to travel on these roads at peak times to understand how bad the situation is now and think about how an extra 1000cars would create a huge negative impact on this. This site in the existing Green Belt should be removed from the Plan as the exceptional circumstances for its release do not exist. Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: (i) to check the unrestricted sprawl of large built-up areas (ii) to prevent neighbouring towns merging into one another (iii) to assist in safeguarding the countryside from encroachment (iv) to preserve the setting and special character of historic towns (v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. It does not conform to Central Government Policy; it does not conform with current legislation with regard to building on flood risk areas. If you build on the Green Belt you are endangering lives by taking away the much needed natural flood defence which soaks up a lot of rain water. If this land is built on it will have a catastrophic impact on the flooding that already exists. On the 9th of February this proposed site was completely flooded. I dread to think what will happen if this land is built upon. If you build on the Green Belt you are endangering people's lives, you can't mitigate that. A poor woman in Wales lost her life due to the floods, it seems like Calderdale Council are not concerned about the welfare of the residents and are quite happy to endanger their lives if it means they get money from developers. If you take away the Green Belt you will take away the habitat of the wildlife. Where are they supposed to go? The Green Belt is supposed to help protect our wildlife and sustain our ecosystem. The proposed development of the Green Belt will increase the noise and air pollution levels. Calderdale Council recognises that climate change is a huge issue but are actively wanting to add to the problem. Where is the evidence from Calderdale Council to prove that this plan is justified?

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

Duty to Co-operate Reason:

See above.

Suggested Modifications:

Remove LP1625 from the proposal and build on brownfield sites where necessary.

Comments:

Additional Evidence Link:

Comment ID **HRU1493**

Site ref (if applicable):

Person ID: **1244004**

Name: **Ms Victoria Myers**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

It is not protecting green belt land and ensuring brown field sites are developed first. Out of date information, figures need revisiting post brexit and economic growth forecasts, and specific for the local are not based on Leeds. I do not believe this plan complies with the National Planning Policy Framework, in particular section 13. Protecting Green Belt Land A strategic attempt has been made to divide opposition of sites within Greetland, therefore my comments and objections are the SAME for all 4 sites proposed for development, as essentially they are all facing the SAME constraints and will have the SAME detrimental

impact on the locality, for reasons I shall state below

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

Sound Reason:

The infrastructure, in respect transport, highways, education, and medical needs are totally inadequate for any development proposed of this scale. Because there are many other areas including Brownfield sites within Calderdale which have not been considered for inclusion in the in the Local Plan, it smacks of discrimination. Complete disproportionate amount of building proposed for in this area. The revisions to the local plan (when the 4 sites off saddleworth road were added, AFTER the plan was agreed and supported by local councillors) proves further unsustainable development with a disproportionate amount of new homes proposed across four sites in Greetland with over 60% proposed in the Elland area. I might also add that it is evident and has not gone unnoticed of the massive proposal to build in non Labour majority wards. The biggest area for concern is the flooding - not a flood risk as we have seen in 2015 and most recently only in February 2020 the areas are flood plains. Natural springs, even streets and lanes are named after them for a reason! It is not rocket science to get the link between the steep sided hills all around Greetland, surface water will and does pour down the roads and these green field sites do their job to help limit the flood effects, protecting the nearby houses and when the Black Brook can cope, off it goes into the river and on to West Vale, Elland, Brighouse..... If this water has nowhere to go it will have serious detrimental effects not only to the people living in existing and new houses but the wider areas mentioned above as they will flood even worse and more frequently, as a risk to life and certainly detrimental impact to highways and bridges and people being able to get about to do their jobs. The further addition of possibly 1200 cars (2 per household) will increase air pollution and the proximity to the local infant school will have health effects on the children, when we're already facing an unprecedented increase in childhood asthma. The plan was based on housing Requirement to support the economic growth plan. This country has just seen its biggest change in 47 years, Brexit! The plans are not current and not compliant. Economic growth should be called for review! The housing need was calculated in 2016 which will be significantly reduced in Brexit Britain! Wildlife corridor - Currently the valley enjoys the presence of; deer, herons, squirrels, foxes, and other wildlife to the benefit of residents. Final point, The Council should consider increasing the density in the Brighouse building sites, and the CPRE has made this suggestion.

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

Duty to Co-operate Reason:

I have found that Calderdale's publicity surrounding these proposals to have been somewhat limited, and lacking in ensuring complete openness, and robust attempts at consultation with the community. I found it underhand that the local plan was set and agreed and voted on in council in 2018 and then somehow these 4 sites, a not insignificant 600 houses were added in - on a technicality that Councillors agreed to allow small changes without a revote (simplified wording). Is there been any evidence of cross boundary cooperation in meeting the housing needs??

Suggested Modifications:

Brown field sites **MUST** be exhausted before any more development of green belt

Comments:

Additional Evidence Link:

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Comment ID **HRU1494**

Site ref (if applicable):

Person ID: **1244004**

Name: **Ms Victoria Myers**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

It is not protecting green belt land and ensuring brown field sites are developed first. Out of date information, figures need revisiting post brexit and economic growth forecasts, and specific for the local are not based on Leeds. I do not believe this plan complies with the National Planning Policy Framework, in particular section 13. Protecting Green Belt Land A strategic attempt has been made to divide opposition of sites within Greetland, therefore my comments and objections are the SAME for all 4 sites proposed for development, as essentially they are all facing the SAME constraints and will have the SAME detrimental impact on the locality, for reasons I shall state below

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

Sound Reason:

The infrastructure, in respect transport, highways, education, and medical needs are totally inadequate for any development proposed of this scale. Because there are many other areas including Brownfield sites within Calderdale which have not been considered for inclusion in the in the Local Plan, it smacks of discrimination. Complete disproportionate amount of building proposed for in this area. The revisions to the local plan (when the 4 sites off saddleworth road were added, AFTER the plan was agreed and supported by local councillors) proves further unsustainable development with a disproportionate amount of new homes proposed across four sites in Greetland with over 60% proposed in the Elland area. I might also add that it is evident and has not gone unnoticed of the massive proposal to build in non Labour majority wards. The biggest area for concern is the flooding - not a flood risk as we have seen in 2015 and most recently only in February 2020 the areas are flood plains. Natural springs, even streets and lanes are named after them for a reason! It is not rocket science to get the link between the steep sided hills all around Greetland, surface water will and does pour down the roads and these green field sites do their job to help limit the flood effects, protecting the nearby houses and when the Black Brook can cope, off it goes into the river and on to West Vale, Elland, Brighouse..... If this water has nowhere to go it will have serious detrimental effects not only to the people living in existing and new houses but the wider areas mentioned above as they will flood even worse and more frequently, as a risk to life and certainly detrimental impact to highways and bridges and people being able to get about to do their jobs. The further addition of possibly 1200 cars (2 per household) will increase air pollution and the proximity to the local infant school will have health effects on the children, when we're already facing an unprecedented increase in childhood asthma. The plan was based on housing Requirement to support the economic growth plan. This country has just seen its biggest change in 47 years, Brexit! The plans are not current and not compliant. Economic growth should be called for review! The housing need was calculated in 2016 which will be significantly reduced in Brexit Britain! Wildlife corridor - Currently the valley enjoys the presence of; deer, herons, squirrels, foxes, and other wildlife to the benefit of residents. Final point, The Council should consider increasing the density in the Brighouse building sites, and the CPRE has made this suggestion.

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

Duty to Co-operate Reason:

I have found that Calderdale's publicity surrounding these proposals to have been somewhat limited, and lacking in ensuring complete openness, and robust attempts at consultation with the community. I found it underhand that the local plan was set and agreed and voted on in council in 2018 and then somehow these 4 sites, a not insignificant 600 houses were added in - on a technicality that Councillors agreed to allow small changes without a revote (simplified wording). Is there been any evidence of cross boundary cooperation in meeting the housing needs??

Suggested Modifications:

Brown field sites **MUST** be exhausted before any more development of green belt

Comments:

Additional Evidence Link:

Comment ID **HRU1505**

Site ref (if applicable): **LP1625**

Person ID: **1242828**

Name: **Mr Charles Littley**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

See reasons below

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

Sound Reason:

See reasons below

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

Duty to Co-operate Reason:

Greetland has been banded with Elland and Stainland. This is ridiculous and is not a true representation of the situation or the area . Why is this development LP0952, LP0026, LP0177, LP1625,even in the Local Plan when Brownfield sites are available (but have been removed been removed ) . I think that the local community and beyond have been greatly let down by the Council regarding the lack of information they have provided . Surely, every household in Greetland should have had information by post about these plans as the plans for all sites will affect everybody in Greetland ,surrounding areas and other areas in some some way .It is then up to them to object /not object as the case may be .I believe Calderdale Council has not given ALL the community the chance to air their views. I myself would not have known of this plan had it not been brought to my attention by a group on Facebook . I OBJECT to all the sites LP0952, LP0026, LP0177, LP1625 being part of the Local Plan for the following reasons 1. Increased chances of Flooding 2 Loss of Greenbelt , open spaces and Urban Sprawl 3. Increased levels of air pollution 4.Schools , Doctors,Dentists 5. Loss of wildlife and habitat 1. Increased chances of Flooding Building on this site which has watercourses and springs ...not good for a new development and not good for any existing properties below or next to the site when the springs are diverted elsewhere by the developers..Add to that the run off from hundreds of new properties .The extra pressure this run off will have on Black Brook ,surrounding

flood plains and homes will be devastating. On Sunday 16th of February a protest walk was held by members of the community...Starting at the school down to Black Brook (where last week you would have needed a boat.....the fields were totally flooded) ,up Gatehead Lane and back down Saddleworth Road to the school taking in all of the proposed sites, Site number LP0026 ,Site number LP0177 ,Site number LP0952 ,Site number LP1625 .They will have seen the expanse of run off into Black Brook as they had to negotiate their way through it to get to Gatehead Lane. To build on this site could have catastrophic effects for homes and businesses already in this area and further afield. It just doesn't make sense. Climate change isn't going to go away but we can try to slow down the effect by not creating more problems. Do we want this beautiful valley to become another flood disaster, where people who lose everything are expected to just pick up the pieces and carry on with everyday life as if nothing has happened.The effect on a person's longterm mental health and wellbeing must be huge .Don't build on these sites, surely Prevention is better than Cure and and less expensive in the long run .If these developments were to go ahead who would be accountable when problems start arising .....Calderdale Council ??? Developers ? ? ?? Or will they just take their ££££££££££ and run. Does anyone actually care? Can we have answers please ? The DEFRA 25year plan states that "National flood management involves the use of a variety of measures including storing water on open land". NPPF 14 (157b) states that plans should work to safeguard land from development that is required or likely to be required for current and future flood management. The current policy and legislation on flooding states -“due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere. Chapter 14, paragraph 163 of the NPPF states: -“When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere Boris Johnson has thrown housebuilding plans into confusion, by suddenly calling for an end to construction on flood plains. Around 9 per cent of new homes in England are built on land where there is a -“high probability” of flooding ; and a recent investigation found that 10,000 are currently in the pipeline. On the campaign trail in flood-hit Derbyshire, the prime minister said: -“We've got to stop building on flood plains. We've got to stop building on areas which are vulnerable to flooding. Calderdale Council Planning Department has a duty of care to comply with current policy and legislation on flooding. Housing should not be built on sites such as this. Now is the time to step up ,stop building on flood plains and learn by past mistakes .Stop putting lives at risk. 2. Loss of Greenbelt , open spaces and Urban Sprawl The purpose of Green Belt policy is 'to prevent urban sprawl' and 'to prevent neighbouring towns merging into one another.' The location of this proposed site would go against that ; there would be less clear boundaries between Greetland and Barkisland NPPF Section 13 Protecting Green Belt Land Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: 1) to check the unrestricted sprawl of large built-up areas (2) to prevent neighbouring towns merging into one another (3) to assist in safeguarding the countryside from encroachment (4) to preserve the setting and special character of historic towns (5) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Calderdale Council, in its own evidence, concludes that this area of Green Belt performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt Brownfield sites should be developed first and sites with better infrastructure links. Avoid development upon flood plains. We are compounding the existing risk by continuing to build on flood plains.The more we pave over natural areas the easier it is for water to move across the land and into the rivers.Why have Brownfield sites been overlooked ? Planning framework states that sites to be removed from greenbelt should only be done so in exceptional circumstances.What are the exceptional circumstances ?.....I can't see any . The proposed development represents a disproportionate amount of new development in Greetland . Now is the time to step up,stop building on Green Belt such as this (which helps store water and protects land below thus helping in the prevention of rivers flooding ) and learn by past mistakes.Stop putting lives at risk 3. Increased Traffic congestion and air pollution The area has not got the infrastructure to cope with anymore traffic .West Vale is a bottleneck at the best of times .Saddleworth Road ,Rochdale

Road ,Stainland Road are usually at a standstill. We've had 4/5 way traffic lights for weeks making the congestion worse than ever. Building these planned sites would be madness. It will be easier to go to Oldham shopping etc rather than sit in traffic trying to get to Halifax. Saddleworth Road has had a lot of roadworks recently ,is this work that needed doing or is it paving the way for plans which haven't been passed yet? 600 new homes ...1200 plus more cars. I quite often see young children (vulnerable members of society) walking to school either with parents or with the Walking Bus maybe in the hope of getting some fresh air and exercise. Walking past queues of traffic with engines running is not a good way to achieve that. Even at school and pre school in the playground children are at risk from air pollution .1200 plus more cars to add to the queues of traffic that line up outside the school on a daily basis. Air pollution causes heart problems /lung problems and others,is this what we should be doing to our children/grandchildren . A little further down Saddleworth Road is an old people's home...Woodfield Grange (vulnerable members of society) This is the introduction to the Calderdale AIR Quality Action Plan

\*The main reason for tackling poor air quality is to address its impact upon health and quality of life. Its effects are felt particularly by the most vulnerable members of society such as the very young ,the elderly and those already suffering from other health conditions.It is also damaging to the local economy. Poor air quality can result in loss of working days,reduced productivity,increased absenteeism from school and a drain on national health.\*

4. Schools ,Doctors ,Dentists Schools are already at capacity.What effect would it have on children already in the area getting places....would they be the ones having to go to schools elsewhere. Doctors and dentists are working at full capacity. Are you planning on new schools, doctors surgery etc and if so where will all these be built.....on more Green Belt?

5. Wildlife and habitat Last but not least the wildlife and their habitat would reduce dramatically. In this area there are many species dwelling here, deer,foxes,buzzards,owls,kestrels,herons,bats and lots more. The area is a wildlife corridor which will get smaller and smaller and eventually we will lose the wildlife. So much of our wild life is in decline we see it on television and in the news .Loss of habitat caused by developers who are interested in one thing and one thing only ....Money. Let's hope Calderdale Council do the right thing and scrap these plans before it's too late for all of us.

Suggested Modifications:

LP0177...LP0952..LP0026.. LP1625 Don't build on these flood sensitive sites leave them as Green Belt .

Comments:

Additional Evidence Link:

|                                                                                                     |                |                |                           |               |
|-----------------------------------------------------------------------------------------------------|----------------|----------------|---------------------------|---------------|
| Comment ID                                                                                          |                | <b>HRU1520</b> | Site ref (if applicable): | <b>LP1625</b> |
| Person ID:                                                                                          | <b>1243993</b> | Name:          | <b>Miss Ann Wickens</b>   |               |
|                                                                                                     |                | Organisation:  |                           |               |
| Agent ID:                                                                                           |                | Name:          |                           |               |
|                                                                                                     |                | Organisation:  |                           |               |
| Do you consider the plan to be Legally Compliant?: <b>No</b>                                        |                |                |                           |               |
| Legal Compliance Reason:                                                                            |                |                |                           |               |
| Insufficient discussion or dialogue with local population                                           |                |                |                           |               |
| Do you consider the plan to be Sound?: <b>No</b>                                                    |                |                |                           |               |
| Sound Reason:                                                                                       |                |                |                           |               |
| This developement would cause disproportionate amount of new households along Saddleworth Road that |                |                |                           |               |

would impact on local infrastructure that already is struggling to manage the current local populations need Thisdevelopment would affect and destroy local wildlife natural habitat and interfere with outdoor activities of all age groups It is close to local caravan park where I am aware of friends who visit our area regularly to enjoy the open green area We have walking paths and as a runner enjoy the well-being of the environment which will be rendered toxic with increased motor vehicles and building work

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

Duty to Co-operate Reason:

No cooperation with locals I respect of our needs concerns or future heath

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU153**

Site ref (if applicable): **LP1625**

Person ID: **1239041**

Name: **James James Waddington**

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 wish to object to the above mentioned references of the Calderdale Local Plan. Please see considerations for objections below: - Effect on local roads will be significant. West Vale and Greetland are at breaking point at peak times and during the day. The proposed amount of housing will only add to the currently strained local roads. In order to accommodate the amount of houses a significant redesign of the local roads will be required, including the deomoiiton of a portion of west vale. I ask have you been to West vale at rush hour? - Effect on local wildlife. The proposed plans are to be built on a wildlife corridor. This includes a healthy marine biodiversity of the black Brook, including dippers, herons and brown trout. Housing on this land will have a significant impact on the diversity of the land. None marine wildlife including bat's, foxes and deer are also present - effect on local facilities. Doctors and additional amenities are already stretched due to the closure of additional local facilities in towns such as Sowerby Bridge. Housing to this proportion without additional facilities is unimaginable - effect on the water table. In 2015 significant flooding was caused to the Calder valley including elland. The proposed sites sit upstream from a small channel waterway that passed through the centre of west vale. Significant flooding will occur to property and business if the plans are to go ahead. Calder Council is building additional flood defences throughout the valley, however, there is no consideration for the removal of flood plains - there is no consideration for the building on brown field sites. I hope will keep me updated on the progression of these plans.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1546**

Site ref (if applicable): **LP1625**

Person ID: **1244121**

Name: **Mrs Anna Sladdin**

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:

From my understanding from NPPF Paragraph 143 only in 'very exceptional circumstances' may permission be given to build upon green belt land and also once all brown field sites have been exhausted. I do not believe that the council have exhausted the search for brown field sites in Calderdale and as such it would be unjust to see the Greetland green belt as suitable for building in this case. This green belt area in Greetland is also preventing 'urban sprawl' which is vital for villages to maintain their boundaries and have open green space which the Government continue to promote and cite as beneficial to communities for physical and mental health and well being. Furthermore although desirable to a developer due to location, outlook and affluent area, the four sites proposed in the Greetland (LP0177, LP0952, LP1625 and LP0026) area are not suitable for the amount of housing development proposed for a number of reasons. Greetland is a village built in a hillside with a brook running through the bottom. The majority of the green belt land for consideration is on the edge of this brook - a brook that is more and more often flooding due to increased surface run off from the hillside which is already predominantly built upon. As it stands, the areas marked as green belt land at the side of Saddleworth Road in Greetland is just about managing to absorb all the surface run off water from the tarmac and overflowing springs in the local area on 'regular weather days' but over recent weeks there has been more examples of extensive flooding to all four of these sites as a result of what once could have been termed 'freak weather conditions' but as climate change is upon on us, these instances are more common occurrence (as demonstrated by Storm Ciara and Storm Dennis in February 2020 alone). Building on these four plots in the bottom of the valley would not provide this vital wash land and would contribute greatly to more serious flooding to our area which has seen extensive devastation through West Vale, Elland, Sowerby Bridge, Mytholmroyd and Hebden Bridge to name only a few towns/villages in Calderdale that have been affected. In addition to the significant flooding certainty which has already been causing problems to local residents without the 600 additional houses being built, I have serious concerns for the lack of suitable infrastructure to deal with such a build. It can be safely assumed that each new house will come with at least one, if not two or three vehicles per household. There are two roads running through Greetland, both of which are significantly congested causing queuing traffic past the school and pre-school on occasion through rush hour traffic. As well as Saddleworth Road and Rochdale Road being the main routes into the larger towns and to the motorways for commuters from Greetland, they are also the sole routes for residents from surrounding villages of

Barkisland, Norland and Krumlin and as such, a further 600-1500 cars on this road will cause increased traffic congestion and pollution which is of additional concern as this will be next to the schools and pre-schools where our children play out and breath in these toxic vehicle fumes. I understand that the sewerage system which also running parallel to the brook is already full to capacity and at times overflowing in to the brook. How will a further 600 houses impact upon this system - I believe the answer is that it will be unable to cope and subsequently flow into the brook further polluting the water and causing damage to wildlife in the local area. I have already mentioned the school. Greetland Academy is at full capacity and oversubscribed most (if not every) year(s). I am aware that there is no capacity to extend the school therefore the proposed housing development will further put pressure on school places and expect further commuting to schools further afield for Greetland residents, further adding to the traffic congestion and pollution already mentioned.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1561**

Site ref (if applicable): **LP1625**

Person ID: **1128267**

Name: **Powers**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

See attached comment.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5610137>

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Comment ID **HRU1579**

Site ref (if applicable): **LP1625**

Person ID: **1244134**

Name: **Mrs Amanda Bennett**

Organisation: **CEO The Greetland  
Acaademy Trust**

Agent ID:

Name:

Organisation:

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 are a great many considerations to be put in place before this plan is viable which include: Flooding  
Risk Traffic Congestion & Road Safety Infrastructure & Capacity Greenbelt

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5610152>

Comment ID **HRU1591**

Site ref (if applicable): **LP1625**

Person ID: **1244129**

Name: **Mrs Kyrie Travis**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The Local Plan does take into account paragraph 177 of the NPPF and the associated PPG in the  
Sustainability of Greenbelt Sites. According to NPPF Paragraph 143 it states 'Inappropriate development is,  
by definition, harmful to the Green Belt and should not be approved except in very special circumstances.'  
And I do not feel that there are any very special circumstances for this site.

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

Sound Reason:

GREEN BELT The site satisfies multiple criteria for Green Belt. It is a known wildlife corridor, offering a  
home to countless animals and birds that would all be displaced. Residents in the area have noted sightings  
of bats, badgers, foxes and other animals, as well as lots of birds and surely, we should be working to  
protect these areas and the animals that live in them. Calderdale Council stated that Local Plan will only  
use 2% of the Green Belt but the proposed development in our area of Greetland is 38% of our Green Belt  
which is outrageously disproportionate. Especially when there are so many brownfield sites which could be  
used instead. NATURAL FLOOD DEFENCE I feel that one of the fundamental points to raise is the fact that



the fields, which make up the greenbelt, act as natural drainage areas. The rain we experienced in Halifax, and the subsequent flooding, both in 2015 and more recently on Saturday 8 th and Sunday 9 th February 2020 is an example of how important pieces of land like this are to act as natural flood defences. If this land was built on where would all the excess water go? Probably to already built up areas, causing unknown levels of damage and chaos to existing residents. We only need to look on our doorstep, at areas like Sowerby Bridge, Mytholmroyd and Hebden Bridge, and how devastating the flooding has been to see the potential impact this could have in our own community. A video posted on social media on 30 th January 2020 highlighted Calderdale Councils bid to combat a Climate Emergency, which seems highly contradictory. A spokesperson on the video even mentions that in Calderdale we are -“vulnerable to extreme weather events” including flooding” So the Council are clearly aware of the problems in the local area and developing natural flood defences is certain to make this even worse. Surely if the local Council have recognised that there is a problem in the borough then plans to develop green belts sites shouldn't even be considered! **TRAFFIC CONGESTION** As a former resident of Rochdale Road in Greetland and a current resident of Saddleworth Road, I know all too well that traffic congestion in the area is a real problem. The area cannot cope with the current volume of traffic which travels through the area, particularly in West Vale and smaller country lanes such as Scar Bottom, on a daily basis so it is difficult to image what the area would be like with so many more vehicles. **LOCAL INFRASTRUCUTURE** Another major concern is the local services which support the area, such as the doctor's surgeries and Greetland Primary School. Only recently I visited my midwife and was asked to book a blood test at the surgery within 2 weeks of the appointment, but the surgery didn't have an appointment for 5 weeks! Resulting in a trip to the local hospital so this could be done within the required timescales. It's difficult to envisage how the area could cope with so many more residents, all requiring access at some point to these services in the local area. It's clear to see from the number of people objecting to these plans just how important the greenbelt is to the local community. So many people are passionate about saving this and it seems ridiculous to even be considering greenbelt sites when there are so many brownfield sites which could and should be considered first. Once our greenbelt is developed and built on it is gone forever and we need to protect areas like this, which offers habitats to wildlife and help to avoid potentially devastating flooding.

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

Duty to Co-operate Reason:

The council have made no effort to advise us of the proposed development of this site, we have received nothing through the post, via email or seen anything in the local area.

Suggested Modifications:

I would suggest removing this site from the Local Plan

Comments:

Additional Evidence Link:

Comment ID **HRU1605**

Site ref (if applicable): **LP1625**

Person ID: **1244117**

Name: **Mrs Linda Littley**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

see reasons below

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

Sound Reason:

see reasons below

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

Duty to Co-operate Reason:

Greetland has been banded with Elland and Stainland. This is ridiculous and is not a true representation of the situation or the area . Why is this development LP0952, LP0026, LP0177, LP1625,even in the Local Plan when Brownfield sites are available (but been removed ) I think that the local community and beyond have been greatly let down by the Council regarding the lack of information they have provided . Surely, every household in Greetland should have had information by post about these plans as the plans for all sites will affect everybody in Greetland ,surrounding areas and other areas in some some way .It is then up to them to object /not object as the case may be .I believe Calderdale Council has not given ALL the community the chance to air their views. I myself would not have known of this plan had it not been brought to my attention by a group on Facebook. I OBJECT to all the sites LP0952, LP0026, LP0177, LP1625 being part of the Local Plan for the following reasons 1. Increased chances of Flooding 2 Loss of Greenbelt , open spaces and Urban Sprawl 3. Increased levels of air pollution 4.Schools , Doctors,Dentists 5. Loss of wildlife and habitat Building on this site which has watercourses and springs ...not good for a new development and not good for any existing properties below or next to the site when the springs are diverted elsewhere by the developers The extra pressure this run off will have on Black Brook ,surrounding flood plains and homes will be devastating. On Sunday 16th of February a protest walk was held by members of the community...Starting at the school down to Black Brook (where last week you would have needed a boat.....the fields were totally flooded) ,up Gatehead Lane and back down Saddleworth Road to the school taking in all of the proposed sites, Site number LP0026 ,Site number LP0177 ,Site number LP0952 ,Site number LP1625 .They will have seen the expanse of run off into Black Brook as they had to negotiate their way through it to get to Gatehead Lane. To build on this site could have catastrophic effects for homes and businesses already in this area and further afield. It just doesn't make sense. Climate change isn't going to go away but we can try to slow down the effect by not creating more problems. Do we want this beautiful valley to become another flood disaster, where people who lose everything are expected to just pick up the pieces and carry on with everyday life as if nothing has happened.The effect on a person's longterm mental health and wellbeing must be huge .Don't build on these sites, surely Prevention is better than Cure and and less expensive in the long run .If these developments were to go ahead who would be accountable when problems start arising .....Calderdale Council ??? Developers ? ? ? Or will they just take their ££££££££££ and run. Does anyone actually care? Can we have answers please ? The DEFRA 25year plan states that "National flood management involves the use of a variety of measures including storing water on open land". NPPF 14 (157b) states that plans should work to safeguard land from development that is required or likely to be required for current and future flood management. The current policy and legislation on flooding states -“due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere. Chapter 14, paragraph 163 of the NPPF states: -“When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere Boris Johnson has thrown housebuilding plans into confusion, by suddenly calling for an end to construction on flood plains. Around 9 per cent of new homes in England are built on land where there is a -“high probability” of flooding ; and a recent investigation found that 10,000 are currently in the pipeline. On the



Let's hope Calderdale Council do the right thing and scrap these plans.

Suggested Modifications:

LP0952, LP0026, LP0177, LP1625 should be scrapped

Comments:

Additional Evidence Link:

Comment ID **HRU1610**

Site ref (if applicable): **LP1625**

Person ID: **1244137**

Name: **Mr James Gilligan**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

he Local Plan does not address the implications of the National Planning Policy Framework, especially, NPPF Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. According to the NPPF Para 143 under 'Proposals affecting the Green Belt' it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' The very special circumstances are non-existent in this site. This development would definitely contribute to future flooding in the area. The plans have in no way had any in-depth consideration and the impact on the infrastructure, environment and community will be devastating. One of the Greetland councillors - Marilyn Greenwood stated that she was not even told about the Planning Meeting when this plot was added!

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

Sound Reason:

Points of Objections Air Pollution Flooding Infrastructure Wildlife Traffic Congestion Loss of Public Space  
1 Air Pollution The severe increase in traffic (potential for 1200 additional cars which could equate to 2400 journeys each day) down an already congested Saddleworth Road. Already in peak periods the traffic backs up Saddleworth Road for at least ¼ mile with engines running! No air quality assessment has been undertaken in this area so we don't even know the extent of air pollution before the proposed development. Greetland Academy has the playground for nursery children right at the side of the road ; goodness knows how the proposed development will impact on these vulnerable, very young children which goes against the Government's strategy on air quality.  
2 Flooding The area concerned floods at least once a year in varying degrees ; the worst instances have been Boxing Day 2015 and recently 9 th February 2020, the development will have a significant detrimental impact on flooding. The run off into Black Brook will cause serious downstream effects, for example, the floods of 9 th February saw Greetland Cricket Club, Heath Rugby Club and Clayhouse Park all under water ; so it is hard to understand how any flood plan could mitigate against the risk of even more severe flooding in West Vale leading to major issues for all the businesses and residents. It is impossible to understand how the proposals in the local plan can be in any way aligned to the recent declaration by Calderdale Council of a climate emergency. These proposals will inevitably lead to a flooding emergency, probably not what the Council had in mind by its declaration.  
3 Infrastructure The development has only one road in and out and all the residents would have to use their

cars as the development is not on a regular bus route ; again going against Government Transport Policy. Local schools are over subscribed meaning parents will have to use their cars to take children to schools out of the area. All doctors surgeries are currently full and one is soon to close again impacting on the two remaining local ones. Other developments in the area have been mainly 3 and 4 bedroom houses (not affordable housing for local people). This type of housing attracts commuters who typically work in Leeds or Manchester and will therefore have to travel to the motorway via West Vale or Ripponden neither which can cope with traffic as it is today! 4 Wildlife The local wildlife will be decimated by any further development particularly birdlife such as Herons, Kestrels, Kingfishers which are seen very regularly flying around the area. 5 Traffic Congestion It is already extremely difficult to pass through the traffic lights at West Vale and the development will only add to the congestion both in West Vale and also Ripponden. 6 Loss of Public Space The area concerned is a very valuable green space for people of all ages to enjoy daily and is extremely popular with walkers, runners, etc.It is a really tranquil spot where people can get away from the stresses of life. It is also within walking distance of the local community and therefore people do not have to drive to enjoy the countryside.

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

Duty to Co-operate Reason:

Suggested Modifications:

the greenbelt should be kept as greenbelt.

Comments:

Additional Evidence Link:

Comment ID **HRU1631** Site ref (if applicable): **LP1625**

Person ID: **1243369** Name: **Mr Geoffrey Eagle** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

Alternatives are available nearby that do not appear to have been considered. For example, there is a 6.53-acre site for sale by JLL off Ellistones Lane Greetland that could be used for housing.

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

Sound Reason:

Traffic on Saddleworth Road and at the West Vale traffic lights junction will increase and this is a problem. Traffic at the nearby school is already a problem at certain times of the day and new access roads and additional traffic will make this a lot worse. Surface water currently absorbed by the fields would increase in an area where is already a problem. Evidence from photographs; I attach below a photo that illustrates the surface runoff problems typical of this area. Footpath just along Saddleworth road , showing surface water on Sunday 9 th February.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5610186>

Comment ID **HRU1638**

Site ref (if applicable): **LP1625**

Person ID: **1244140**

Name: **Mr Simon Walsh**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

1) The Calderdale Statement of Community Involvement 2015 states: -“We need to be very clear about what we are asking people and we must be sure that people understand what will happen as a result of this engagement. This includes being clear about what decisions have been made, what have not, and who will make the final decision.” The proposed site is directly opposite my front door and a development on this site would have a huge impact for my family and our family life, yet to this day, I have never received a single piece of correspondence regarding this proposal, therefore lacking the clarity and involvement which the SCI calls for. With regards to the online portal, LP1625 is listed as part of Elland, which it clearly isn't. This is misleading and means it is easy for the site to be overlooked by residents who otherwise would want to state their objection. The process is far from 'simple' and is certainly not making it 'easy to get involved.' (SCI 1.3) 2) In the words of Esther McVey, Housing Minister's written policy on Green Belt land: -“Of course one of the most important environmental safeguards we have is the Green Belt. And I want to be clear that our commitment to this is as strong as ever, with any changes only happening in exceptional circumstances ; protecting the Green Belt goes beyond protection against development” In these circumstances, our Green Belt is not being protected. In the local plan, this site is being referred to as 'green field' when it is legally classed as 'green belt' and therefore should only be built on under exceptional circumstances and 'when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including :- making effective use of suitable brownfield sites.' ( The Government White Paper -“Fixing our Broken Housing Market” Parag 1.39) There are other suitable brownfield sites in the local area which could be used and therefore would mean the 'right houses were being built in the right places.'

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

Sound Reason:

Disproportionate amount of building in the Greetland area. As sites LP26, LP177, LP953 and LP1625 are so close in proximity they cannot be viewed individually as the overall impact of the local plan would be catastrophic to Greetland as a whole and the surrounding areas. Under the Calderdale Review of Polling Districts 2019, the number of properties per polling district is as follows: Greetland 1221, Sunnybank 505, West Vale 1119. This totals 2,845 properties. As LP0026, LP0177, LP0952 and LP1625 are all in immediate vicinity of Greetland and Sunnybank wards, combined this would see 543 additional new houses built in this distinct community on top of capacity allocated in the 2018 plan. As a percentage of the 3 wards this

would see a disproportionate growth of 19% or 22.4% when adding in the 2018 site allocations. It could also be argued that the West Vale Ward is a community in itself (having its own primary school) which would take growth of Greetland and Sunnybank to 31.4% or 33.8% when including 2018 allocations. Previous potential sites which were considered and consequently rejected (report CC37) stated that it would give a "disproportionate increase to Barkisland village". The increase based on the same dataset above would have been 16.6%. which is far less than the huge potential increase of up to 33.8% in Greetland. If this plan was to be passed, surely that would show a great inconsistency in policy and legality regarding planning applications. NPPF (para 133/ 134) also states that aim of Green Belt policy is 'to prevent urban sprawl' and 'to prevent neighbouring towns merging into one another.' The location of this proposed site would go against that ; there would be less clear boundaries between Greetland and Barkisland and the distance from local amenities would become an issue. The Inspector's letter of 16 th July 2019 to the Council notes (para 14) that: ' Local plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.' The site might be 'within a 0-15 minute journey of a town centre; is within 600m of Public Open Space; and within a 15 minute journey to a GP surgery' these simple benefits are irrelevant when it takes into account that the massive increase in traffic from the combined sites will increase travel time substantially, the local GP surgery is full and may no longer be within 15 minutes due to the increase in resulting traffic; that the majority of the public open space is actually part of the local plan to be built on; that the 'cleaner air' that Calderdale is fighting for will be heavily polluted by the increase in traffic and associated pollution from our already crumbling infrastructure. Where are the benefits? NPPF (para 94) also states: 'It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: 28 a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.' Greetland does currently have sufficient school places to meet the needs of the existing community but not for the needs of potentially 600 more families. I can clearly state that no consideration or preparation has taken place to resolve the issue of school places with the local schools and, as our immediate schools are academies, they cannot be forced to expand. The only benefits I can see are short-sighted ways of meeting council targets and lining the pockets of developers ; no benefits for the existing community or for the people who would live in these houses. Flood areas The NPPF states that planning policies and decisions should promote public safety and take into account wider security and defence requirements by: ' a) anticipating and addressing possible malicious threats and natural hazards... This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area .' Labour Council leader, Tim Swift, is urging the Government to grant Calderdale urgent assistance by recognising it as a 'Tier 1' authority getting extra funding support because it is one of a small number of areas of the country at "sustained risk" of flooding.' Not a flood risk as stated in the local plan but a flood certainty- an area which will flood repeatedly and has over the last 5 years. Conserving and enhancing the historic environment NPPF (para 187) 'predict the likelihood that currently unidentified heritage assets, particularly sites of historical and archaeological interest, will be discovered in the future.' Combined with site LP0177, this area is clearly of historical importance with archaeological finds on this site (post medieval stone skull) and historical buildings on LP0177 (18 th mill). I understand that an archaeological field evaluation would need to take place (in line with NPPF 127) yet no evaluation has been mentioned in the report for the adjacent fields (LP0952). Surely it would be common sense to assume that settlers on these sites during those times would have moved over the wall to the next field! Covering these fields in concrete and houses would not only have a negative impact on the lives of present day inhabitants but would do a disservice to the inhabitants of our past, destroying our local history irreversibly.

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

Duty to Co-operate Reason:

As mentioned previously, Calderdale Council have done nothing to inform residents of the local plan. It could also be argued that listing all four local sites under 'Elland' and the complex method of objection were all strategies to stop residents having their say rather than co-operating with residents.

Suggested Modifications:

Removal of all Green Belt sites (LP0026, LP0177, LP0952 and LP1625) and a revision of brownfield sites for any new and existing opportunities both in our authority and within neighbouring authorities.

Comments:

Additional Evidence Link:

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Comment ID **HRU1643**

Site ref (if applicable): **LP1625**

Person ID: **1243952**

Name: **mrs angela jackson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Nil public consultation in nearly 4 years, about the LP. Most Greetland residents discovered the LP through a recently formed facebook group.

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

Sound Reason:

see attached file.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5610194>

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Comment ID **HRU1650**

Site ref (if applicable): **LP1625**

Person ID: **931414**

Name: **Mr Edward Greenwood**

Organisation:

Agent ID:

Name:

Organisation:



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

Legal Compliance Reason:

I submit that the Local Plan is not legally compliant in the following circumstances: That reference to the Town and Country Planning (Local Planning)(England) Regulations 2012 Part 6 Sec18 (1) and (2) in that the Authority have not shown evidence that they have complied with the requirement to inform in the preparation of the plan

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

Sound Reason:

In the matter of soundness of the Local Plan, I submit that the Authority has significantly understated its density allocations and that the Corporate Lead has not addressed this issue as promised at the termination of the Stage 1 hearing. It is stated that the density shall be a minimum 30 per hectare yet there is an instance where this is less. Also the Local Authority's Director of Regeneration stated in his report that the update cannot change except for 'typographical errors and presentation in order to give clarity' yet on the 20/1/2020 a substantial change in developable area and residential capacity was made. The Corporate Lead also stated at the termination of the Stage 1 hearing that the subject of the Aspirational Economic Growth would be addressed. There is no evidence that this has taken place in this update despite evidence that the relationship between Economic growth and Housing is tenuous and that the Growth rate is not supported by national available datasets. Your attention is drawn to the following. Para 133 of the NPPF (2019) where the essence of the Green Belt is described. The two essences are given as permanence and openness. Hence any piece of land designated Green Belt, however large or small, cannot be taken out of Green Belt status or it will have lost its permanence. Similarly it cannot be built upon or it would lose its openness. Para 136 states that, in constructing Local Plans, local authorities can alter Green Belt boundaries only in exceptional circumstances. Thus, should an exceptional circumstance be proven then the Local Authority may alter the boundaries of a Green Belt area. It should be noted that the operative word here is 'alter'. Now in which way can a Green Belt boundary be altered? To answer that question we must refer back to para 133. If the boundary were altered in such a way that it removed land from the Green Belt that would then contravene para 133 which determines the permanence of Green Belt. Thus the only boundary altering that may be done is the extension of an area of Green Belt by moving its boundary outward. \*\*\*\*\* Mr Justice Jay in the *Calverton Parish Council v Greater Nottingham Councils* [2015] EWHC 1078 stated that :- "it would be illogical, and circular, to conclude that the existence of an objectively assessed [housing] need could, without more, be sufficient to amount to - "exceptional circumstances" within the meaning of paragraph 83 of the NPPF (2012)". This judgement also applies in context of paragraph 136 NPPF (2019). *R (Lee Valley Regional Park Authority) v Epping Forest DC* [2016] EWCA Civ 404, Treacy, Underhill, Lindblom LJ - "The concept of - "openness" here means the state of being free from built development, the absence of buildings; as distinct from the absence of visual impact". [7] *Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council* [2015] EWHC 1078 (Admin), Jay J. Richard Turney appeared for the Claimant - "Mr Turney" submitted that the fact that a particular site happens to be suitable for housing development cannot, without more, constitute an exceptional circumstance justifying an alteration of the Green Belt. I Mr Turney insofar as this goes" Suitability simpliciter cannot logically be envisaged as an exceptional circumstance. Thus the Local Plan contravenes the NPPF wherever it attempts to take land out of Green Belt status for the purposes of housing need \*\*\*\*\* WSP Parsons Brinkerhoff Report to Calderdale M.B.C. CALDERDALE LOCAL PLAN TRANSPORT EVIDENCE BASE 2017 However there are several problems with this. First notice that the housing projection for Node 3247, New Gate Farm (276). This gives a traffic flow increase to 115%. Secondly, Note that there is no assessment of projected land from LP1407, LP0026, LP1625, LP1283, LP0037, LP0065, LP0982, LP0146, LP0951, LP0041 and LP1470. This

totals a possible extra traffic flow at Exley Lane as 1929 by virtue of houses (1057), a further increase of 19%. This also does not take into account the consequential traffic flow through Stainland Road/Saddleworth Road Junction in West Vale which will have to take this traffic as well. Also there is no assessment of the input to Rochdale Road/Stainland Road junction by virtue of the output of Stainland Road/Saddleworth Road junction. Again no assessment has been made due to other sites in Greetland and Stainland Ward. Also West View has been assessed as being 87 houses where the Local Plan now shows 127 houses. Therefore I conclude that the WSP Parsons Brinckerhoff report is flawed and that CMBC cannot consult the public on incomplete and/or incorrect data. Node 3948 LP1223 Lowfields, Lacy Way, Elland due to Saddleworth Road Current Traffic 458; Expected Traffic 624; 36%increase Node 3247 Effect on Exley Lane New Gate Farm, Saddleworth Road Houses 276; Current Traffic Flow 401; Expected Traffic Flow 715; Increase 73% Ellistones Place Saddleworth Road. Houses 279; Current Traffic 783; Expected Traffic 938; Increase 20% Not included in Node 3247 assessment LP1407 26 Scar Top LP0026 67 The Gate Farm LP1625 36 Silverdale LP1283 19 Glenholme LP0037 30 Long Heys Farm LP0065 36 Nab End LP0146 31 Church Lane P0041 15 Stainland Road Included in Node 3247 assessment LP0177 279 Ellistones Place LP0952 319 Land at New Gate Further Notes WSP Parsons Brinckerhoff Technical Note 1 Sections 5.6.4 In Greetland, the area south of the Saddleworth Road is not currently served by high frequency bus corridors. It might be possible to increase service levels on existing routes. However, given the distance from existing high frequency corridors and the level of congestion at West Vale, this might be perceived as not commercially viable by operators. In addition, congestion at West Vale makes bus journeys from Greetland to Elland and Halifax less reliable Your attention is also drawn to the effect of the Calderdale CIL Charging Schedule Section 3.7 shows this site LP1625 to be in Zone 5 thereby attracting a residential charge of £5 per sqm. Given that the average new build is about 67 sqm. That this site has been assessed as 30 dwellings gives a CIL contribution charge of £10,050. Given that the CIL legislation requires 15% to be allocated to the community for its agreed benefit then the amount realised (£8,542) does not appear to be sufficient to fund the mandatory infrastructure, Flood mitigation, Primary and Secondary Education, Green Infrastructure , Improvement, Highway Schemes, Public Transport Schemes, Pedestrian and Cycle Networks, Sports Leisure and Recreational Facilities and Public realm Improvements, The overall educational requirement of the sites on Saddleworth Road are approximately 600 dwellingsand using Calderdale M.B.C. education ratio of .35 per dwelling suggests school place requirement of 210 school places. This is untenable as only approximately 2 places are available at Greetland academy (Business Manager, Greetland Academy) in any one year usually due to families leaving the area. Notes: Former Car Lots on Queens Road, Pellon. This has sat derelict for years and is surely prime for re-development. Old Lane (Off Keighley Road) a Former Mill Building and land in excess of 8 acres which is prime for re development

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

Duty to Co-operate Reason:

The original Local Plan was placed before a full chamber of Councillors for discussion and amendments. This update has not and therefore differences in outcomes have emerged whereby the assessments in the original Local Plan do not reflect the outcome of these updates. Also the preparation of the Local Plan requires involvement of local businesses. This update being a material difference has not sought such commitment and therefore could be viewed as non-adherence to legislation.

Suggested Modifications:

To rescind this update and merge it with the original Local Plan such that the public can comment on the now unavailable assessments on these additional sites.

Comments:

Additional Evidence Link:

Comment ID **HRU1668**

Site ref (if applicable): **LP1625**

Person ID: **1244084**

Name: **Mr Daniel Black**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The proposed development is contrary to government policy. It does not comply with NPPF guidelines, government guidelines on the use of green field sites or government guidance on building on flood zones.

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

Sound Reason:

Flood Risk ; Flooding is a huge issue around Calderdale. We have seen the disruption, chaos and pure misery this causes local people as recent as 9 th February 2020 (see attached images of Blackbrook). To suggest building such a huge development above and in a flood plain, just seems completely illogical. The negative impact that will be felt on properties that are already at risk and ones that will be at risk from an increase in water runoff is beyond comprehension. For this reason alone, the development should be rejected. To even suggest increasing the risk of flooding to local residents is mind boggling. Highway / Local Infrastructure : The development will have a hugely negative effect on the already extremely busy Saddleworth road / Stainland Road and Rochdale Road / Stainland road junctions. The roads already struggle to cope with the amount of traffic from commuting, so it seems implausible to increase the traffic by a potential 1000+ additional vehicles using this route. The junctions at the Co-op on Saddleworth road and Tesco on Stainland road are already extremely dangerous for pedestrians, this danger would amplify significantly due to the increased usage from the residents of the proposed development. Parking is also a huge problem in West Vale, to increase the local population by such a large number would put the already lacking parking to bursting point and would increase risk to drivers and pedestrians safety massively. The local school has no capacity to extend, and has expressed several times that it is not willing to extend. The doctor's surgery is already packed and it can take several weeks to get an appointment. Local dentists are not accepting any NHS patients. There is also a huge shortage of police numbers for an area recently targeted by gangs of car thieves, to increase the number of potential victims of crime, would put a huge strain on an already stretched Police service. POLLUTION / AIR QUALITY ; The pollution caused from the increased number of cars on the roads is unimaginable and the health of the Junior School children would be at a high risk as would the whole community. It is a fact that increased pollution would seriously affect the health of our children both now and in future generations. Noise pollution ; The proposed development will directly, negatively affect the quality of life of local people through noise pollution for many years, due to building work and industrial machinery. This will also have an adverse effect on the wildlife that will be disrupted, particularly during mating season. Greenbelt & Wildlife - The proposal is also an inappropriate development within greenbelt land. Consideration to build such a large number of dwellings on Green Belt land is totally against all current guidelines and recommendations. Earlier surveys stated the area to be "highly sensitive" The area is a haven for Deer, foxes, Herons, bats and more recently the owls have returned. Not to mention the joy it brings to walkers. Size and density of proposed development - The layout and density of the proposed development is inappropriate to the local area, as forementioned, the infrastructure simply could not handle such an increase in residents or traffic. This development has already been rejected previously, so to regurgitate the same plans without any solutions to flooding, noise, pollution or risk to life concerns is to say the least, bizaar! To approve such a

development, would set a dangerous precedent for future proposals on such fragile and important greenbelt land. With the threat of a global climate emergency, it is baffling to suggest that any development would be built on such precious land.

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

Duty to Co-operate Reason:

I feel there has been a very limited co-operation from the council.

Suggested Modifications:

Move the proposed house building to brown field sites. Re-look at the flooding issues

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5610224>

Comment ID **HRU1671**

Site ref (if applicable): **LP1625**

Person ID: **1244169**

Name: **mr Giles Walker**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

It contravenes the councils own stated policy on green field building and that of land at high risk of flooding / land that effects the surrounding area with regard to flooding

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

Sound Reason:

The idea of soundness for this site is a joke..... Adding more houses here (indeed anywhere on Saddleworth road ) to the numbers planned is madness given the clear limitations the area and its infrastructure can support.

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

Duty to Co-operate Reason:

Please see attached objection document

Suggested Modifications:

Please modify this application to 'Rejected' status.....

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5610298>

Comment ID **HRU1672**

Site ref (if applicable):

Person ID: **1243982**

Name: **Mrs Linda Ashton**

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:

Allocation Numbers LP0177, LP0952, LP1625 and LP0026 Flooding ; The way land has been allocated for the Local Plan, if it is allowed to be developed, the area will become a 'perfect storm' for flooding disasters. Part of the land in plot LP0177 is allocated as Flood Zone 3a, however, this does not actually provide a fully realistic picture of how this land frequently and routinely floods. The way in which this land floods poses a risk to life, never mind a risk to property and infrastructure, which it absolutely does. The area most severely impacted by flooding is at the bottom of the chain of land for development, so development further upstream from this land, and this land itself, would increase risk to life and risk to existing property and infrastructure. To say that the effects of flooding can be safely and effectively mitigated against is totally unsupported due to the lack of testing. There is no record of sequential or exceptional testing. Please see the attached evidence as proof of how badly this area is hit by flooding. The land in the Local Plan, in Greetland was even flooded during the consultation period for the Local Plan. What are the chances? Well, relatively high actually when you take into account how often we experience flooding, and given the time of year. A major bridge in Elland was destroyed after the last episode of extreme flooding, Boxing Day 2015. This bridge was operational again less than 3 years before a shipping container crashed into it in February 2020, again due to flooding. The Flood water carried the shipping container downstream, from where it once stood on dry land. The council had to inspect the bridge for structural damage. The council does not have the funds to keep repairing infrastructure and improving flood defences. Over thirty million pounds, and I use that figure so as to be cautious ; it may now have increased considerably ; has been spent on Flood defences in Calderdale. Please see attached evidence of flooding. Calderdale Council is requesting both special classification and extra funding from the government due to the routine problems we face in Calderdale regarding Flooding. The only 'special circumstances' are the flooding circumstances. It is in no way sustainable to build on land that has such a close relationship to flooding. Flooding in the immediate area has already cost the council millions of pounds, like the rebuild costs of Elland bridge. The way the land in this site of the Local Plan acts so as to retain and reduce the flow of flood water is actually economically valuable to the council and the community. We can't afford to keep repairing infrastructure damaged due to flooding. To release this land for development would have detrimental economic implications; it is not economically viable. The NPPF clearly states that development should not put existing property at risk; building on this land puts Woodfield Drive at a directly increased risk of flooding. Development of this land also puts areas further downstream at an increased risk of flooding. The water from Black Brook contributed to the destruction of major infrastructure in 2015. With Climate changed, the situation with flooding in this area should not be actively made worse in addition to the increased threat posed by natural forces; this is also something supported by the NPPF. On the grounds of flooding alone, this site should be removed. There is no mitigation that could equate to the way in which the land currently processes flood water. Is this why details of mitigation have been left out of the plan? Green Belt ; The development proposed for this plot of land completely ignores the adverse effects of building on Most Sensitive Green Belt. The council has stated in the evidence it has provided that this site performs strongly against the 5 purposes of Green Belt land. To release Green Belt land for development,

when the housing requirement cannot be sufficiently justified would cause significant and unnecessary damage to the community and the environment. This land should not be wasted in this way. There is no justification for the release of this Green Belt land under 'special circumstances,' as the alleged housing requirement is unjustifiable, due to the out-of-date information it is based on. The Local Plan in Calderdale is based on pre-Brexit figures. The council is also suggesting that we will experience growth that totally contradicts national trends, despite the fact that Calderdale is recorded as being a poorly performing council. The housing requirement is totally unjustifiable on paper. In reading the inspector's letter, we believe that the inspector has already realised this for herself. To release Most Sensitive Green Belt that also is extremely sensitive due to its relationship with flooding, based on and unjustified housing requirement is not a sustainable or prudent planning strategy.

**Sustainability and Infrastructure ;** The scale of development is beyond the infrastructure capabilities of the village. The site is not sufficiently sustainably located to accommodate the scale of development proposed. The local school is an academy, and therefore not obliged to expand. **Traffic Impact ;** There would be a significantly adverse impact on the Strategic Road Network. In the Council's individual assessments of the sites, which resulted in them all being filtered and not taken forward for housing, the consultation from Highways England advised that the development of the scale envisaged would have a significant adverse traffic impact on the Strategic Road Network. Given this how can the sites now be put forward for allocation for housing when nothing has been done to either challenge those comments or address them? Similar issues have been highlighted in Hipperholme, and subsequently sites were removed. The level of air pollution around West Vale traffic lights, and Saddleworth Road where the traffic is known to tail back as far as the school has not been monitored, to public knowledge. There is no evidence of sufficient monitoring in any of the paperwork connected to the Local Plan. We did see official looking individuals appearing to carry out some form of traffic monitoring, during the consultation period, but this was for a brief period of time, in the middle of the afternoon. If this is the monitoring the council or the developers suggest that the inspector should make a decision based on, then it is woefully insufficient, and does not in any way represent the reality of the traffic situation on Saddleworth Road. The residents are not dreaming up the issues we face in this area due to West Vale traffic lights. Why are the issues at Hipperholme recognised, but the issues at West Vale masked over? The surrounding areas have to travel through Greetland and thus West Vale traffic lights in order to reach towns and the motorway. The traffic created by commuters poses a serious constraint to this development, one which has not sufficiently been addressed. This development has been allocated without operational assessment of the local road network. To say in the site report that the cumulative traffic impact is being assessed is not sufficient. To what degree is the cumulative traffic impact being assessed? Due to the traffic constraints of Saddleworth Road and the surrounding area, this development is not sustainable.

**Air Quality ;** The scale of development proposed would have an unacceptable impact on air quality. The level of air pollution around West Vale traffic lights, and Saddleworth Road where the traffic is known to tail back as far as the school has not been monitored, to public knowledge. There is no evidence in any of the paperwork connected to the Local Plan. Saddleworth Road is a highly sensitive road in terms of air pollution due to the high numbers of children present on this road, as the local primary school and preschool are both situated on Saddleworth Road, in immediate proximity to the congestion areas. Children are at an increased risk of air pollution ; this is a scientifically recognised fact.

**Loss of Open Space and Public Amenity ;** The development would result in the complete loss of natural and semi-natural open space. The landscape would be irreversibly changed to such a degree that it would no longer attract residents to use the public right of way. The proposed development would make the public right of way unfit for purpose and unsafe for use. The risk of crime and the fear of crime would be greatly increased by the alteration to the public right of way brought forth by this development.

**Ecology ;** There would be an unacceptable impact on wildlife habitat arising from the scale of development proposed, which is totally unnecessary given that the housing requirement is much too inflated in reality.

**Heritage ;** No assessment has been made of heritage impact. Why has an assessment not even been carried out? Again, this points to the fact that land was entered into the plan in a rushed manner without due care and diligence.

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

Duty to Co-operate Reason:

Suggested Modifications:

Remove this site from the Local Plan. Increase density in Brighouse. Revisit the out-of-date, inflated housing requirement.

Comments:

Additional Evidence Link:

Comment ID **HRU1676**

Site ref (if applicable): **LP1625**

Person ID: **1243877**

Name: **Mrs Pauline Atkinson**

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 that it is a sound plan for the following reasons, Infrastructure Building new houses away from amenities and town centres with no proposed infrastructure results in a negative impact on the whole planet. This is not town planning this is a knee jerk reaction to an uplift requirement in the housing numbers. The resulting extra traffic will result in extra CO2 emissions this does not correlate with the council's Clean Air policy. How can the council expect residents to use public transport and cycle routes where there are NO PLANS for any infrastructure in Greetland. A train station in Elland does not help as the proposed houses are to be built in Greetland not Elland. Green Belt The NPPF states once established Greenbelt boundaries should only be altered when exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. This has not been demonstrated. Brownfield sites must be exhausted. There is a brownfield site for sale on Saddleworth Road which must be considered first. Other housing developments in town and city centre served well with public transport should have the density optimised. Could this be done? Have discussions with other neighbouring authorities taken place to identify if they could accommodate extra housing. The inspector acknowledges that the relationship between employment growth and new housing is complex and the Turely (2019) report on - "modelling the economic implications of the proposed housing requirements Calderdale council" whilst this report contributes to how the labour force is assumed to behave, it doesn't appear to consider accommodating the houses in neighbouring authorities. It is therefore felt that the council has not fully exhausted all options in order to prevent the development on Green Belt. The development will be more than 2KM from a train station. Grade 3 agricultural land will be lost. Loss of habitat for animals such as Woodpecker, deer, pheasants, owls, bats, Kestrels and herons. Flooding I have lived in Greetland for 43 years. In the past 5 years I have noticed the flooding getting a lot worse, however there has been minimal flooding of houses in Greetland as sites such as LP0026 have acted as flood plains. With developments of these sites I am concerned that when the next extreme weather arrives people's homes and businesses will flood. The environment Agency classifies this site as having a high flood risk.

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

Duty to Co-operate Reason:

Suggested Modifications:

Remove site from Local Plan

Comments:

Additional Evidence Link:

Comment ID **HRU1684**

Site ref (if applicable): **LP1625**

Person ID: **1239517**

Name: **Mrs Nada Duckworth**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I accuse Calderdale Council of misrepresenting this area, incorporated Greetland with Elland. Greetland is a Village and Elland is a Town, different populations and different post codes. By doing this it is misrepresenting the volume of build allocated to this area, this can not be lawful under misrepresentation and even in the Local Plan you have put us down as Elland. All the other areas have been correctly labelled. 1) The current policy and legislation on flooding states -“due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in high flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere”- In the Calderdale Boxing Day Floods 2015 the field LP0177 Ellistones Place Saddleworth Road, Greetland suffered severe flooding. Any building on this land would cause flooding and therefore does not comply with current flooding policy and legislation as outlined above. Calderdale Council Planning Department has a legal responsibility to comply with current policy and legislation on flooding. These fields are a natural and essential soak off and any building on this land would further increase the flooding in this high risk flood area. 2) I draw your attention to Esther McVey, Housing Minister's written policy on Green Belt land.; -“Of course one of the most important environmental safeguards we have is the Green Belt. And I want to be clear that our commitment to this is as strong as ever, with any changes only happening in exceptional circumstances ; protecting the Green Belt goes beyond protection against development”- Esther McVey has provided Â£2 million pounds for Councils to employ Enforcement Officers to prevent Green Belt land being built illegally and Calderdale Council is listed as one of the Councils who is a recipient. The Enforcement Officer's role is to ensure "unscrupulous developers" do not apply pressure on Councils to build on the Green Belt and not the available brown field sites because "developers don't want to build on brown fields sites". - Horsfall Mill is an ideal brown field site and meets the demographics of the area perfectly and complies with the NPPF government policy of - “building the right houses in the right places”- Exceptional circumstances in The Government White Paper -“Fixing our Broken Housing Market”-Parag 1.39 states that: The Government wants to retain the high bar to ensure the Green Belt remains protected, but we also wish to be transparent about what this means in practice so that local communities can hold their councils to account therefore we propose to amend and add to the National Policy to make it clear that: authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including :- making effective use of suitable



brownfield sites (Calderdale Council has not adhered to this with regard to Horsfall Mill, West Vale) and the opportunities offered by state regeneration:- I refer to the Judicial Review - Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council (2015) EWHC 1078 (Admin), Jay J - where Richard Turney appeared for the claimant "Mr Turney ... submitted that the fact that a particular site happens to be suitable for housing development cannot, without more, constitute an exceptional circumstance justifying an alteration of the Green Belt. I agree with Mr Turney insofar as this goes .. Suitability simpliciter cannot logically be envisaged as an exceptional circumstances". -This land is classified as "highly sensitive green belt" on the Local Plan and there is no legal justification for building on this land. It is not legal to classify Green Belt as green field on the Local Plan ; they are totally different and your own tests states all the Green Belt land identified on Saddleworth Road in the Local Plan for building meets the five test and therefore you have no legal right to change this classification. I question the legality of Greetland being placed in with Elland on the Local Plan; Greetland is a small village in the Greetland/Stainland Ward HX4 whereas Elland is a town HX5 ward. This is false representation and when you look at the building volume within this area of approximately ½ a mile in this small village taking out the whole of the Green Belt land on the south side of Saddleworth Road this will totally change the nature / look and the openness of the village and is a prime case of urban sprawl. Mr Justice Jay in the Calverton Parish Council v Greater Nottingham Councils [2015] EWHC 1078 stated that:- -“it would be illogical, and circular, to conclude that the existence of an objectively assessed [housing] need could, without more, be sufficient to amount to -“exceptional circumstances” within the meaning of paragraph 83 of the NPPF” R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404, Treacy, Underhill, Lindblom LJ -“The concept of -“openness” here means the state of being free from built development, the absence of buildings ; as distinct from the absence of visual impact” [7] Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council [2015] EWHC 1078 (Admin), Jay J Get

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

Sound Reason:

First minister of Wales Mark Drakeford on a report about flooding; stated some local authorities are putting greenery on flood planes and building and asked if he would buy a house on such a development. He replied -“There are rigorous planning laws in place and local authorities should not be building on flood planes!” Does this mean Calderdale are exempt? Horsfall Mill, West Vale is ideally located for affordable, good quality housing; it would not change the nature or look of the village and is perfectly located for young first time buyers to access the many amenities / leisure facilities without the need for a car. The Calderdale Plan targets for housing as we have now come out of the European Union the housing volume should be less resulting in a much lower housing target and reduce the need to release the Green Belt sites in Greetland. The NPPF sets out the aim of Green Belt policy which is -“to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.” (NPPF 79). Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: (i) to check the unrestricted sprawl of large built-up areas (ii) to prevent neighbouring towns merging into one another (iii) to assist in safeguarding the countryside from encroachment (iv) to preserve the setting and special character of historic towns (v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The Council, in its own evidence, concludes that the overall parcel within which the site is located performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt but, most decisively, would see the coalescence of Greetland and West Vale and the deterioration of the identity of both places undermining the Council's Settlement Hierarchy. Notwithstanding this, the quantum of housing proposed in and around the site is undeliverable during a single plan period in plan-making terms and unsustainable in infrastructure terms in relation to the capacity of existing highways, schools and local services. Accordingly, these sites on

Saddleworth Road in the existing Green Belt should be removed from the Plan as the exceptional circumstances for their release does not exist. Furthermore the proposed sites do not meet national policy with regards to flooding. Clean Air Policy ; even higher numbers of traffic would cause further pollution in what is already a bottleneck area of high congestion. And be detrimental to the health of the toddlers / young children at Sunny Bank Nursery / Pre-School whose playground is situation approximately 3 feet from this very busy main road (picture attached of congestion down this road). Saddleworth Road services many areas i.e. Barkisland, Ripponden, Norland and other outline districts and heavy goods vehicles regularly use this road e.g. Sonoco; these are high pollutant diesel vehicles and evidence shows particles of pollution fall lower to the ground making small children more vulnerable.

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

Duty to Co-operate Reason:

To built on the Green Belt sites proposed in the Local Plan would totally change the nature / look and openness of the village in a very detrimental way to both residents and wildlife in this wildlife corridor whilst also being illegal due to the flooding and protected Green Belt policy in the NPPF.

Suggested Modifications:

N/A

Comments:

Additional Evidence Link:

Comment ID **HRU1697**

Site ref (if applicable): **LP1625**

Person ID: **959557**

Name: **Mrs Nikki May**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I strongly object because the local plan is in contravention of NPPF Section 13 Protecting Green Belt land Paragraph 80. Once green belt land is gone, it is lost forever

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

Sound Reason:

I believe the plan is not sound in a number of areas  
1 Flood Risk Infrastructure Wildlife Loss of Public Space Airquality  
1 Flood Risk With the increased regularity and severity of flooding in the Calder valley, the development of this land will be hugely impacted by flooding. The water run off into Black Brook already causes serious problems downstream- only a fortnight ago the floods of 9 th February saw Greetland Cricket Club, Heath Rugby Club and Clayhouse Park all under water ; so it is hard to understand howbuilding on this site, which is aflood plain, could possibly be a sound proposal.  
2 Infrastucture The village road infrastructure is already choked up at rush hour, and the proposed number of houses will attract families and easily twice the number of cars to houses All local doctors surgeries are currentlyoversubscribed The local schools are oversubscribed so where would the children of the residents of the new development go to school?  
3 Wildlife The local wildlife will behugely impactedby the proposed

development particularly birds such as Herons & Kestrels. I am a regular walker in the area and am heartbroken that this beautiful ecosystem could be lost forever. 4 Loss of Public Space The importance of green space with fields and trees and nature cannot be underestimated. This land is part of a beautiful and tranquil space where people can get away from the stresses of life. It is also within walking distance of the local community and therefore people do not have to drive to enjoy the countryside. 5 Air quality The huge increase in the number of motorcars will have a negative effect on local air quality. 600 houses equates to a potential for 1200 additional cars from the 4 proposed Greetland LP sites - which could equate to 2400 journeys each day. Currently both Saddleworth Road and Rochdale Road are already clogged each morning with stationary cars having their engines running and polluting our village.

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

Duty to Co-operate Reason:

Suggested Modifications:

I believe this site should be removed from the local plan and other brownfield sites identified instead

Comments:

Additional Evidence Link:

Comment ID **HRU1733**

Site ref (if applicable): **LP1625**

Person ID: **1244178**

Name: **LYNDSEY ASHTON**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I do not believe that the Local Plan adheres to legislation set out in The Climate Change Act 2008 (2050 Target Amendment). I am not able to see any evidence of additional measures to respond to climate impacts of above-trend growth in employment and housing.

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

Sound Reason:

Flooding ; Part of the land allocated in the Local plan is allocated as Zone 3a, and it is at the bottom of the chain of development. Development is only acceptable if sequential and exceptions tests are passed. There have been no such tests carried out. There is clear, extensive evidence that this site floods and on a much larger scale than is represented in the site report. Green Belt ; adverse impact arising from allocation on land identified as Most Sensitive Green Belt. Heritage ; no assessment has been made of heritage impact. Sustainability and Infrastructure ; the scale of development is beyond the infrastructure capabilities of the village. The site is not sufficiently sustainably located to accommodate the scale of development proposed. Traffic Impact ; there would be an adverse impact on the Strategic Road Network. Air Quality ; the scale of development proposed would have an unacceptable impact on air quality. Open Space ; there would be complete loss of natural and semi-natural open space. Ecology ; there would be an unacceptable impact on wildlife habitat arising from the scale of development proposed. Loss of Public Amenity, Habitats and Biodiversity: Paragraph 98 of the NPPF clearly states that Planning policies and

decisions should protect and enhance public rights of way and access. The site report for LP0177 acknowledges the importance of the recreational value of the Black Brook area, and hence the public right of way that allows the community access to this area. However, the site report wrongly suggests that the development will increase recreation pressure on the Black Brook. This simply will not be the case, due to the extreme destruction of the landscape surrounding Black Brook. The visual amenity currently provided by the site would be wiped out by the proposed development, and by way of closing in the public right of way, the footpath would become unsafe for users, and hence unfit for purpose. I shall further expand upon these points below. The community gains access to this amenity, the public right of way, and hence Black Brook, via the entrance to the east of the junior school. If a housing estate lines, and therefore closes in and narrows the public right of way, the landscape will be significantly harmed to such a degree that the amenity will be rendered unfit for purpose. Further to this, altering the amenity of the public right of way in such a dramatic fashion will render the footpath, currently used daily and frequently, unsafe. This is because the development will result in the amenity losing its open quality. Very recently, a woman was brutally sexually assaulted in Elland, in an area that was not an open space with good visibility. This type of narrowed, long pathway attracts crime. To remove the openness and visibility of this well used public right of way will put those who use it at a considerably increased risk of crime. The NPPF states that the Local Plan should create safe accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion. The open space along this public right of way must be maintained in order to reduce the occurrence of crime, keeping this amenity a safe place for the community to continue to use. To close in the public right of way is in direct opposition with the National Planning Policy Framework. The NPPF sets out the need to protect existing open space, which this plan does only in pseudo form; it does not protect the amenity or the community using it. The proposed development along this amenity is inappropriate. The NPPF sets out the requirement for support of local communities through local neighbourhood plans to identify for special protection green areas of particular importance to the community, by designating the land as Local Green Space. The NPPF guards against the unnecessary loss of valued facilities and services, particularly when this has the effect of reducing the community's ability to meet its day to day needs. A huge number of individuals within our community use this public right of way to walk their dogs, take exercise, and unwind and destress in the form of walks in a tranquil setting, all of which they currently have access to for free, in a safe environment. Children take great joy in walking along this public right of way, and gain valuable access to the natural world in an ever-increasing age of digitalisation. Many scientific studies have been conducted on the value and importance of children spending time outside in the natural world, science has also established a connection between spending time outdoors and the increase of life expectancy. The importance of this public right of way is evidenced in the photographs of the community protest walk, which took place along the public right of way, on Sunday 16 th February. This walk was so popular that it featured in the local and regional press, and was even featured in the local press prior to the walk, as it was such a huge issue within the community. All land in the proposed plan was walked along during the walk. The NPPF asserts the importance of protecting areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason. This applies to the public right of way down the side of the primary school, and along Black Brook. These policies must be effectively adhered to, or they become pointless in their existence. This land is classified as highly sensitive land on the Local Plan. Along Black Brook, we currently have a wildlife corridor, which is further testament to the beauty and tranquillity of the area which the proposed development would unavoidably decimate. The introduction of non-physical disturbances to the wildlife and protected species in our area, such as noise, vibration, visual presence, human presence and light pollution, in combination with increased air pollution, given that the proposed development is in a disproportionately highly concentrated area along a condensed stretch of one road, would have disastrous effects on the wildlife corridor. In effect, we would lose much of the life we currently see along this vital public amenity. The NPPF states, under the section addressing Habitats and Biodiversity, paragraph 174, that the Local Plan must, 'protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological

networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity"; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation.' The way in which this plan proposes to impose such a largescale development along the stretch wildlife corridor, when less sensitive land was removed from the updated plan, is in direct opposition with the NPPF. Developing the land on this site would take the form of a negative response to the local context of this amenity. This proposal, by way of its drastic removal of open space ; directly related to this public amenity, unreasonably compromises the way in which the community routinely takes part, on a daily basis, in legitimate recreational activities along the public right of way. Activities and community groups like 'Little Wanders,' currently use the public right of way amenity, that stretches the length of the proposed development, which is not an unreasonable expanse of land to protect. These community walks, geared at allowing young children and their families access to free exercise and social interaction, are incredibly important to the health and wellbeing of our community. The children who participate are allowed to become more in touch with their environment than they routinely are in our ever-increasing digital world. As a result, the children become better integrated into society and are more committed to protecting the environment. It is important that the next generation is educated about their environment, within their environment. In this way, the Green Belt serves as a place of education and a means of bolstering the community.

Calderdale has been identified as a deprived council. The latest government figures show that Calderdale is in the top quarter of most deprived authorities in the country. There will be serious detrimental impact on the wellbeing of the residents in this one, small area of what has been classed as a deprived council. This type of facility serves to protect and bolster mental health within the community. As stated on the Gov.UK website, 'A new study has been published by Natural England which reviews the benefits and outcomes of approaches to green care for mental ill-health'; A report published February 9 2016 shows that taking part in nature-based activities helps people who are suffering from mental ill-health and can contribute to a reduction in levels of anxiety, stress, and depression.' At a time when mental health is arguably at crisis point, designated areas where individuals and community groups know they can visit are invaluable. Designated spaces like the popular amenity public right of way in Greetland, which runs alongside our precious wildlife corridor and Black Brook, can afford communities free and easily accessible facilities, facilities which the council can cheaply and effectively work into mental health schemes. The importance of this site is due to the amount of biodiversity of wildlife concentrated in this area. The NPPF states that the Local Plan should take account of climate change over a long period of time, including factors such as flood risks, changes to biodiversity and landscape. The NPPF also states that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. To put the wildlife corridor at an increased risk of survival, and potentially decrease biodiversity in the area, at a time when climate change already poses a risk to it, especially given that the land is at high flood risk, would be in direct opposition to that which the NPPF sets out to protect and preserve, and for good reason. For this reason, development on this land is not environmentally sustainable. Paragraph 175 of the NPPF states that, 'When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts)'; which the community is immediately able to jump in with stating that this cannot be said to be the case in the Calderdale Local Plan, as land was removed from Stainland, which is far less sensitive, in terms of the risk development would pose to wildlife, biodiversity, habitat and landscape. In this way the land in Greetland put into the Local Plan is not compliant with the NPPF.

**Flooding:** The Land put forward in the Local Plan is unsustainable. One of the reasons for this is because it is within a high-risk flood area. This factor has not been given anywhere near enough scrutiny at the plan-making or decision-making stages. The housing estate, Woodfield Drive, to the east and in immediate contact with plot LP1077, is at a direct, increased risk of flooding. Flooding is so bad in Calderdale that the Army was called in, in February 2020, in a bid to help protect persons and property from yet another severe flood. The way in which the Calder Valley routinely experiences flooding can be best understood by Labour Council leader, Tim Swift, urging the Government to grant Calderdale urgent

assistance by recognising it as a 'Tier 1' authority getting extra funding support because it is one of a small number of areas of the country at "sustained risk" of flooding.' The NPPF states that planning policies and decisions should promote public safety and take into account wider security and defence requirements by: a) anticipating and addressing possible malicious threats and natural hazards... This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.' In February 2020, our community saw Black Brook turn into a raging torrent of water that posed significant danger to both life and property. There is not a risk of flooding in this area, but a certainty of it. A certainty that grows year on year with the ever-increasing threat of Climate Change. The way in which this valley, with its steep sides, floods is a natural hazard. Residents on Woodfield Drive routinely have to take measures to prevent their homes from flooding. We have photographic evidence of how this is a routine battle that residents face, and not enough is being done to help prevent this from happening in the future. To build on this land would sign residents and the community wider community to an unbearable, unavoidable fate The NPPF states that, 'due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere.' The topography of our area would not allow for it to be any other way than to increase the risk of flooding to the existing community. The sloping grassland, the trees and the flat flood plains of the land put forward in Greetland in the Local Plan retain an immeasurable amount of water when it really matters. No amount of 'mitigation' can compete with this. To build on this land would have catastrophic and irreversible ramifications, and not just for the immediate area, but for the areas further downstream currently protected by this precious land and the way it currently functions. Residents in Bradley were in the local press this week to express their despair at how they believed a development had caused flooding to their property. This is what a spokesperson for the residents had to say in the local press, "œWe never had flooding problems when this site was a meadow and did its job as a meadow and soaked up rainfall, releasing it slowly into the woods. Due to the topography of the area and surrounding areas, we have already experience catastrophic destruction, as seen in 2015 when a major bridge, Elland Bridge, was destroyed by flood water, causing huge disruption and economic expense. Last weekend, flood water carried a shipping container, from Greetland, downstream until it eventually crashed into Elland Bridge. The Bridge had not yet been open three years since being rebuilt due to the last flood. The council had to inspect the bridge for structural damage after last weekend. How can building houses in a high-risk flood area be inline with the NPPF's golden thread of sustainability? The economic ramifications in the form of destroyed infrastructure alone is enough to void this development proposal. Prime Minister Boris Johnson has even, on multiple occasions in the press, called for councils to stop allowing building on flood plains. As a community, and as the people who experience first-hand, all year round how unpredictable the water system is in this area, we are constantly reminded of the topography of our landscape and the surrounding areas, and the impact it already has on our lives. Over thirty million pounds has so far been spent on flood defences in Calderdale, and still we are having to have the Army called in to help protect us from flood water. It is not right to build on the land in Greetland put forward in the Local Plan. Flooding cannot be mitigated against in this area. The land as it stands, is helping to prevent further disaster, and must remain as it is. To even suggest altering the way in which this land functions is an inappropriate and irreversible gamble. It is not fair to gamble with the lives of the community, when the community is so opposed to it. The NPPF states that the Local Plan should take account of climate change over a long period of time, including factors such as flood risks, changes to biodiversity and landscape. The NPPF also states that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. To so dramatically change the function of the landscape of the sites put forward for development in Greetland would completely disregard the risk climate change poses to the community on the form of flooding. For anyone to tell us that the huge volumes of water we regularly see on this land will

not affect existing property when it is disturbed, we would need to see evidence of prolonged, extensive surveying carried out all year round, and for a number of years. Understanding our complex water system, further complicated by our intricate system of natural underground springs is not easily, if ever, achievable. A testament to this aspect of our topography is evident in the numerous roads and lanes named after their relationships to water and springs. Much of what causes the problems we face in this area is hidden underground in a network, or labyrinth, of fresh water springs. How can we predict how the water will behave after its usual pathways have been disrupted? We have already witnessed how smaller developments in the area, having interfered with the underground water course, have had disastrous impacts on other surrounding properties. If you would like to see photographic evidence to prove this, we have it prepared for you. Green Belt: The Green Belt Review carried out in 2017 considered all three of the sites ; reference numbers 065 and 339 in the review. The conclusion of this review was that all of the sites performed strongly in terms of their Green Belt function, meeting at least 3 of the 5 purposes of including land in the Green Belt. Those 3 purposes were: To prevent neighbouring towns from merging into one another; To assist in safeguarding the countryside from encroachment; To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The 0952 allocation was also considered to meet a further purpose in terms of checking the unrestricted sprawl of large built up areas. We would argue that all three of the sites should be considered to serve this purpose, it makes no sense for just 0952 to do so but 0177 and 1625 not to, given they are all inextricably linked. Development of all sites would result in the unrestricted sprawl of the large built up urban area of Greetland. The three site assessment reports carried out ahead of the consultation on the Local Plan Publication Draft in 2018 concluded that the land represented the "œmost sensitive Green Belt" Given this there is no planning policy justification to ignore that impact ; importantly carried out as part of a thorough Green Belt Review of the borough just over 2 years ago ; and now consider the sites suitable for allocation for housing. Such allocation would conflict with key purposes of including land in the Green Belt and would have a fundamental adverse impact on the openness of the Green Belt. Schools: Paragraph 94 of the NPPF states that 'It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: 28 a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and b) work with schools, promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.' The Local Plan in Greetland has not seen any of this work done in relation to the local junior schools. As far as parents and the local community is aware the local school has not been consulted on the Local Plan. Due to the fact that The Greetland Academy and West Vale School are academies, they cannot be pushed to expand, so perhaps this is why they have not been consulted, however, this is in direct opposition to the National Planning Policy Framework, and therefore not compliant. We know that the primary school is already oversubscribed. The scale of proposed development would completely overwhelm an already oversubscribed school. Children already living in Greetland may face a situation where there is no place available to them at their local junior school. There is also a very real increased risk posed to the children of Greetland Academy, should the proposed development go ahead. Paragraph 109 of the NPPF states that, '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.' I feel that it is my civic duty and moral responsibility to inform the inspector of the current unsafe road conditions on Saddleworth Road, in the surrounding area of the school and preschool. The school is situated on Saddleworth Road, which is already a very busy road, currently with its own safety and air quality concerns. At school drop-off/pick-up times, Saddleworth is reduced to a single lane due to the parked cars of parents, and with significant and unusually high numbers of HGVs using this road, due to the recycling plant further along the road, this makes for a hostile level of traffic and congestion at busy times, and these are the times when the children of our community are on the roads and at the greatest risk. Any further increase to traffic, especially such a significant one, due to the fact that the development is proposed for this road, and this road alone, would

render the road unsafe, specifically due to the number of children on the roadside. Parents already worry about the safety of their children while using this road. Those in power should be taking measures to make the road safer, not putting vulnerable children at an increased risk. When a child is killed on this road, it will be too late. Due to the level of traffic and the type of traffic, namely the large number of HGVs, this road is not suitable for Local Plan development, especially when we consider the risk it would pose to young children. On top of this increased risk of a fatal road traffic incident, the proposed development would also introduce a dramatic increase in air pollution. The proposed development would create a dangerous environment for pedestrians, with no option for mitigation. This road is unable to be made wider. To slow traffic down would only further exacerbate congestion and air pollution in the air that the community and its children have no choice but to breathe. Traffic Impact: In the Council's individual assessments of the sites which resulted in them all being filtered and not taken forward for housing, the consultation from Highways England advised that the development of the scale envisaged would have a significant adverse traffic impact on the Strategic Road Network. Given this how can the sites now be put forward for allocation for housing when nothing has been done to either challenge those comments or address them? The sites in Greetland have not had traffic assessments carried out. Sites elsewhere in Calderdale have been filtered from the Local Plan due to traffic constraints. Given the existing levels of high congestion at the West Vale traffic lights, why has assessment not been carried out? Why has air pollution not been measured? Is it because the sites in Greetland are too appealing to developers, given the high house prices in the area, and some thing like a traffic assessment would throw a spanner into the works, as it were? Where is the Traffic Plan in the site reports for these sights? These sites have been allocated without appropriate assessment of local road networks. To say that the cumulative traffic impact is being assessed is not sufficient, especially given the scale of the proposed development. To increase the amount of traffic on Saddleworth Road, when it is already so heavily congested, and with a high volume of HGVs, by any amount of traffic, without a proper assessment is not a sustainable practice in planning terms. Air pollution: My final point I ask you to consider is the impact of the development of the health of the people in this area, particularly those who live on Saddleworth Road, especially our children, who spend the majority of their waking hours in the primary school and preschool, which are both situated on Saddleworth Road. Our ward already has the highest percentage of cars per household, and this is set to rise by a disproportionately high amount, in line with the disproportionately high number of houses proposed in the plan. A development site, within Calderdale, was thrown out for precisely the same reason. Yet, our site remains, even with such a high - the highest - percentage of cars per household. Due to the lack of public transport, because we live in a semi-rural area, the community does rely heavily on transportation by car, which would unavoidably be the same case for the new residents, should the development go ahead. A wooden fence and a strip of pavement is all that separates the children from the road. A catastrophic increase in air pollution, which is in direct opposition with government legislation to reduce air pollution, is further exacerbated by the fact that Saddleworth Road is unable to manage the current level of congestion. We have extensive photographic evidence of this. Such a disproportionately high increase in air pollution will have unthinkable implications for the children of our community. If the government has set targets to reduce air pollution then it does not make sense to allocate such a vast proportion of the overall planning to one area, along one road, where the pollution in the air will become concentrated and toxic. Calderdale Council have taken steps to reduce air pollution, but the air quality in our area has not been tested. What we as a community cannot support is a huge rise in concentrated air pollution, this is air that young children are forced to breathe every day on their way to and from school, and during their time at school and preschool. These young, vulnerable children will be at a significantly increased risk of developing lifelong debilitating diseases. This is an issue the government has established as a real problem. The amount of traffic in this area would increase anyway, due to other agreed development sites in neighbouring villages, like Elland. Traffic is regularly at a standstill on Saddleworth road, and with the increase of cars on this road, we can expect to see cars at a standstill as far back as the school, which at times is already the case. We have the photographs to prove this. This will result in car fumes being pumped directly, at concentrated levels, into the delicate, developing lungs of school and



preschool children. Everyone in the area will be affected by the huge and disproportionate increase in air pollution, but the children will bear the brunt of the health implications. The polluted air is heavier than clean air, and thus collects closer to the ground. The knock-on effect of this is that the toxic air will fall down the hillside, and even though the school is not as close to Saddleworth Road as Sunnybank Preschool, the school children could stand to experience even worse effects. We have a duty of care to safeguard our children from breathing in such an exponentially increased level of poisonous air. The measures needed to avoid this are simple and easy to take. We can very easily protect these children. If you poison the children, you poison the future of the economy too. As stated on the World Health Organisation's official website, 'An estimated 3.7 million premature deaths are attributed to ambient (outdoor) air pollution, based on WHO data from 2012. Overall, higher urban air pollution concentrations increase the risk for cardiovascular and respiratory disease, cancer and adverse birth outcomes, and also are associated with higher death rates.' The single biggest air polluter is traffic, or road vehicles. More people die of air pollution than Malaria and HIV. For this reason, we cannot allow the toxic chemicals released by cars to increase so dramatically, and directly into the air around Greetland School and Sunnybank Preschool. The World Health Organisation explains that, 'One reason why children are particularly vulnerable to the effects of air pollution is that they breathe more rapidly than adults and so absorb more pollutants. They also live closer to the ground, where some pollutants reach peak concentrations ; at a time when their brains and bodies are still developing.' These are points highlighted in the Clean Air Strategy 2018. While we do need to ensure economic growth, we also need to realise the 'cost of air pollution on health,' as stated in the Clean Air Strategy 2018. 'There are legal requirements and aspirational targets for levels of different air pollutants. The government recognises that protective health - and tackling air pollution - requires action, and is committed to improving the UK's air quality and reducing harmful emissions. The draft Clean Air Strategy, published in May 2018, sets out the case for action and demonstrates the government's determination to improve our air quality.'

<https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-air-pollution>

The above is taken directly from the government websites. The proposed plan is directly opposed to the Clean Air strategy, as the amount of land allocated on Saddleworth Road is disproportionate to the amount of land Calderdale has to allocate as a whole. The overall air pollution will be harmfully concentrated on this one road, a road with an unusually high concentration of children so close by for so much time. Each child spends approximately 7 hours a day on this road, including walking to and from school, which amounts to 35 hours a week. 35 hours a week they will be forced to breathe air that is exponentially more toxic than at present. This is not acceptable, and yet is totally avoidable. Again, we support the need for housing, but simply ask that it is in a place that has less impact on the health of the community, especially the health of our children. We only ask that the life that already exists in this area is respected and not jeopardised.

**Sustainability:** At the heart of the National Planning Policy Framework is the presumption in favour of sustainable development, which should be viewed as a golden thread running through both plan-making and decision-making. In part, the NPPF requires developers to demonstrate the economic, environmental and social impacts of a development by way of a sustainability appraisal. It is the argument of the community that the sustainability appraisal conducted for the Local Plan sites in Greetland is insufficient, as the proposed development in Greetland is actually very much unsustainable. Section 11 in the NPPF outlines what is meant by the efficient use of land. It states that the Local Plan must follow planning policies and make decisions which encourage the efficient use of land by re-using land that has previously been developed (brownfield land). This has not been close to effectively carried out in the area. We have a number of undeveloped brownfield sites in the area, which have not been properly pursued. the revisions to the plan (the addition of the new sites) represents further unsustainable development with a disproportionate amount of new homes proposed across four sites in Greetland with 1,041 additional units of the 1,708 on new housing sites (over 60%) proposed in the Elland area. In particular, scrutiny needs to be made of the Council's Sustainability Appraisal process to support the release of the new sites with the site at 'Land adjacent Ellistones Place' (Ref: LP0177) the most striking example of officers reaching a

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1743**

Site ref (if applicable): **LP1625**

Person ID: **1244126**

Name: **Mr Colin ASHTON**

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:

Illogical settlement extension into the green belt of Greetland: The number of houses would be a huge addition to an area that has already seen continuous development over many years, with the resulting environmental pressure and traffic congestion. Further development could well prove to be the tipping point for Greetland's balanced community with regards to the medical, educational, environmental and socially cohesive state. From data available on the internet, Calderdale demographic information, Calderdale Council. We can see that the graph is approximately a straight line. Therefore we can extrapolate the data to 2040. This gives a projected population increase of 14500 people. The Calderdale Council quotes a housing requirement of houses 14500 houses. This suggests planning for single occupancy Increased risk of flooding: The proposed development of the fields alongside Black Brook, and further up the hillside will remove a valuable absorption area during periods of heavy rainfall. We have experienced significant flooding of the fields after they have become saturated. Building in the fields will increase the runoff into the Black Brook which feeds into the river Calder. This will increase the impact of flooding in Elland and further downstream. The effect of climate change will make flooding more frequent. Due to this, the proposed development does not adhere to NPPF Policy. Traffic congestion: There is currently a problem with the volume of traffic using Saddleworth Road. There is overspill into Rochdale Road during peak periods. Both roads are the main access routes to schools. In particular Saddleworth Road often has standing traffic outside the gates to Greetland School Sunnybank Annex and Greetland Preschool. The resulting exhaust emissions pollute the air in and around the school and preschool. Idling car engines around schools are a well-documented cause of concern for the health of young children whose lungs are more susceptible to permanent damage as their airways are small and still developing. The British Lung Foundation recommends avoiding local pollution hot spots by walking on quieter streets. This is not possible when the stationary traffic is outside the school gates. I believe the junctions at Stainland Road with Saddleworth Road and Stainland Road with Rochdale Road are as congested as Hipperholme Crossroads (known as the Hipperholme Stand-off). At peak times, congested traffic can extend significantly further back than the school on Saddleworth Road. In addition to this, traffic is also seriously congested on Rochdale Road, and extends as far back as the community Centre. Both roads are

interlinked and provide the only way out of Greetland. There simply is not enough road left to store traffic on. Both Saddleworth and Rochdale Road have to filter through the West Vale traffic lights bottleneck.

Environmental: Black Brook is a special area of wildlife and biodiversity. There is the combination of Black Brook with adjoining woodland on one bank and meadows on the other bank. It is a peaceful and tranquil area where people can walk and frequently see herons fishing and the occasional kingfisher as well as numerous other species of birds. At dusk bats can be observed flitting through the evening sky. These easily identifiable creatures are an indication of a healthy natural environment with fish and insects in abundance. Once this environment is disturbed or lost the biodiversity will disappear. This is in direct contradiction to the stated Site Allocation Assessment Methodology Statement section 2.2. -

“Environmental: Contributing to protecting and enhancing our natural, built and historic environment and as a part of this helping to improve biodiversity, use natural resources prudently, minimise waste and pollution and mitigate and adapt to climate change including moving to a low carbon economy. Health and wellbeing: A walk along Black Brook, meeting other members of our community and enjoying the wildlife, peace and tranquillity provides one with the opportunity to think and reflect. This is beneficial to mental health and provides a balance to the pressure of modern life, without the need to get in a car and drive to the Yorkshire Dales. It is a place of education for our children, looking for and identifying the flora and fauna that inhabit the Brook and adjacent fields and woodland. We are constantly advised to take more exercise for both adults and children. The proposed development will diminish the attraction of existing footpaths to the local and extended community, as the current landscape will be removed.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1747**

Site ref (if applicable): **LP1625**

Person ID: **1244133**      Name: **Miss Julie Carter**      Organisation:

Agent ID:      Name:      Organisation:

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

Legal Compliance Reason:

Consultation has been very poor. There has been nothing clearly available that would be appropriate for anyone with a learning disability or communication difficulties as per the Accessible Information Standard.

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

Sound Reason:

GREEN BELT. Why has brownfield land not been considered? Green belt should be protected and according to Calderdale Council, Greener living is a top priority. The plans put the current and future wildlife at risk. FLOOD PLAIN. Surely no one in their right mind would buy property on this site. Has the developer or

anyone from Calderdale Council seen it since the beginning of February? Any flood mitigation put in place will merely move the problem further down the area. TRAFFIC/ AIR POLLUTION. Saddleworth Road is already incredibly busy and varies in speed limits. This does not stop drivers from irresponsible driving parking, particularly around Greetland Academy. This plan would be putting children's health and safety at risk. INFRASTRUCTURE. The proposed development is completely disproportionate to the size of the village. Greetland is a village not a town. The local school is full. Dentists have long waiting lists. It is already almost impossible to get a GP appointment and GP recruitment is known to be in national crisis with a crumbling A&E system as a consequence.

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

Duty to Co-operate Reason:

This objection procedure is difficult to navigate even when computer savvy. Calderdale Council appears to be putting up as many barriers as possible to prevent people from having their say.

Suggested Modifications:

remove this area as one for development from the local plan

Comments:

Additional Evidence Link:

Comment ID **HRU1761**

Site ref (if applicable): **LP1625**

Person ID: **959163**

Name: **Mr Richard Brady**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The process of choosing sites may be being influenced by whether a developer is on board, if so this should be investigated. If better sites are being ignored planning laws may have been breached. The payments to the council from central government for new housing completions may be steering decisions towards sites which can be developed quickly.

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

Sound Reason:

The National Planning Policy Framework basically states Green Belt should only be developed in special circumstances, these have not been demonstrated in respect of all the Greetland sites - LP0625/LP0026/LP0952/LP0177. The above sites should be considered as one parcel as by splitting them up the effect on Greetland as a whole is made less clear. The choice of sites has not properly considered - Impact on air quality Effect on roads and lack of public transport options Lack of infrastructure and amenities - schools doctors, dentists etc Wildlife corridor in Greetland, impact on wildlife. Flooding, surface run off and sewer capacity. loss of open space forever. Location - attractive to incomers working outside the borough.

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

Duty to Co-operate Reason:

Lack of transparency in the process of reintroducing sites. Website is difficult to navigate and Greetland is not Eland in the eyes of people who live there.

Suggested Modifications:

The economic model on which the requirement for new housing was based is not longer fit for purpose as a result of Brexit and the expressed aim of reducing immigration. The council should write back to the inspector to refuse the revised requirement as it stands, other councils faced with the same position have already done so. Review the additional sites, look at building more on dilapidated sites in Halifax Centre which have the necessary transport links already

Comments:

Additional Evidence Link:

Comment ID **HRU1778**

Site ref (if applicable): **LP1625**

Person ID: **1244202**

Name: **Mr Adam Kershaw**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The site requirements relating to the release of the land from Green Belt is not legally compliant, adequately prepared, fully justified or consistent with National Planning Policy Framework (NPPF) and accompanying Guidance(NPPG). Procedural and Legal Compliance Issues I am concerned that Calderdale council has not adhered to legislation set out in The Climate Change Act 2008 (2050 Target Amendment). I am not able to see any evidence of additional measures to respond to climate impacts of above-trend growth in employment and housing. In addition to this, I am concerned about issues actually acknowledged by the Council itself, particularly regarding traffic impacts and flooding. For issues surrounding the proposed development, regarding traffic and flooding, it would appear that the proposal is not, according to the NPPF, sustainable. When the harm identified is taken into account, the proposals are clearly deemed unsustainable. The land in this site is also unsuitable for development due to issues relating to Green Belt and Heritage Assets, and recent planning case law determined by High Court Judgements relating to the siting of Listed Buildings. Further to this, the proposals are not supported by Housing Infrastructure Fund (HIF) from Homes England, and the inadequacy of existing infrastructure to accommodate this level of growth confirms that the proposals are unsustainable. This has even been publicly recognised by our local MP, Craig Whitaker. Flooding Certainty Part of the site is allocated as Zone 3a and is at the bottom of the chain for development, with development only acceptable if sequential and exceptions tests are passed. There have been no such tests carried out. There is evidence that the site floods both severely and routinely. The way in which this happens actually protects property and infrastructure from harm caused by flooding. Mitigation can not equal or surpass the work currently done by this land as it stands. Black Brook routinely bursts its banks, taking hold of entire expanses of meadow land, posing significant danger to both life and property. There is extensive photographic and video evidence of this. Our community begs you to recognise that there is not a risk of flooding in this area, but a certainty of it. The way in which this site faces routine flooding has been well documented on the regional news. National news is now starting to contact the pressure group. This is something we have not gone

looking for, but instead finds us, due to our level of flood risk, or 'flood certainty' as it is now known within the community. We are a small village in Calderdale Yorkshire, why are we being contacted by national media outlets? The issues we face here are real and they are huge. The entire span of land on LP0177 including South of Greetland Academy School was severely flooded in February 2020 (evidence attached). Greetland Pressure Group has attracted attention from both local and regional press and TV with regards to recent flooding and proposed development. This land routinely floods and would leave any proposed development at risk along with any access roads. Development sites LP0177, LP0026, LP0952, LP1625 are critically important in alleviating any further flooding issues by soaking and storing surface water run off from the large amount of natural springs in the area. The Army was even called into Calderdale, in a bid to help protect people and property from yet another severe flood, also in February 2020. The way in which the Calder Valley routinely experiences flooding can be best understood by Tim Swift's, Calderdale Council Leader, words when he urged the government to grant Calderdale urgent assistance. Swift would like to see Calderdale recognised as a 'Tier 1' authority, which would entitle Calderdale to extra funding support, as 'Calderdale is one of a small number of areas in the country at "sustained risk" of flooding.' The head of our council has even recognised the significant threat we face in this area. The topographical context of the proposal in Greetland lends itself to increased flood risks, due to the abundance of natural springs, the water course, and the steep valley sides. All of the factors that contribute towards flooding are against us. Flooding in this part of Greetland is a certainty that grows year on year with the ever-increasing threat of Climate Change. The way in which this valley, with its steep sides, floods is a natural hazard. Residents on Woodfield Drive had to take action to prevent their homes from flooding in February 2020, and not for the first time either. We have photographic evidence of how this is a routine battle that residents face, and not enough is being done to help prevent this from happening in the future. To build on this land would be to sign residents and the community to an unbearable, unavoidable fate. The NPPF states that, 'due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere.' The topography of our area would not allow for it to be any other way than to increase the risk of flooding to the existing community. The sloping grassland, the trees and the flat flood plains of the land put forward in Greetland in the Local Plan retain an immeasurable amount of water when it really matters. No amount of 'mitigation' can compete with this. To build on this land would have catastrophic and irreversible ramifications, and not just for the immediate area, but for the areas further downstream currently protected by this precious land and the way it currently functions. Prime Minister Boris Johnson has even, on multiple occasions in the press, called for councils to stop allowing building on flood plains. Part of Site LP0177 lies within flood zone 3A ; the highest classification of flood risk in terms of land that could potentially be considered appropriate for development. The zone 3A is immediately adjacent to the western and southern boundaries of Woodfield Drive. The land immediately adjacent to the whole southern boundary of the proposed 3 allocation sites is also allocated as flood zone 3A. The photographs that are attached to this submission show the flooding that has occurred on the land. Given that the land is not only identified as being at risk of flooding but is also evidenced as having flooded, there is no justification in land drainage terms to bring these sites forward for housing. Paragraph 155 of the NPPF clearly states that, -"Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk" In putting these sites forward the Council is ignoring the policy requirements of the Framework. The reports compiled by the Council for all four sites on Saddleworth Road when putting together the Publication Draft version of the Local Plan in 2018 concluded that all three should be filtered (i.e. not taken forward as housing allocations) because of ; amongst other things ; flooding and drainage issues. Sequential and exceptions tests would have been necessary to demonstrate that the sites were suitable for and safe to develop. Although the Planning Inspector identified an insufficient supply of housing land following the Stage 1 examination process, it should not simply follow that additional sites are now allocated without a thorough assessment being made as to their suitability to counter the reasons why they were initially filtered. The four sites on Saddleworth Road seem

to have been put forward as a simple response to the Inspector's comments with no consideration of the flooding and drainage issues associated with the land. It is clear that there are blurred lines of responsibility and accountability when serious flooding issues arise between Developers, Councils and the Environment Agency. We need accountability when reckless planning leads to catastrophic flooding issues.

**Green Belt** The Green Belt Review carried out in 2017 considered all three of the sites ; reference numbers 065 and 339 in the review. The conclusion of this review was that all of the sites performed strongly in terms of their Green Belt function, meeting at least 3 of the 5 purposes of including land in the Green Belt. Those 3 purposes were: To prevent neighbouring towns from merging into one another; To assist in safeguarding the countryside from encroachment; To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The 0952 allocation was also considered to meet a further purpose in terms of checking the unrestricted sprawl of large built up areas. We would argue that all four of the sites should be considered to serve this purpose, it makes no sense for just 0952 to do so but 0177, 0026 and 1625 not to, given they are all inextricably linked. Development of all sites would result in the unrestricted sprawl of the large built up urban area of Greetland. The four site assessment reports carried out ahead of the consultation on the Local Plan Publication Draft in 2018 concluded that the land represented the -“most sensitive Green Belt” Given this there is no planning policy justification to ignore that impact ; importantly carried out as part of a thorough Green Belt Review of the borough just over 2 years ago ; and now consider the sites suitable for allocation for housing. Such allocation would conflict with key purposes of including land in the Green Belt and would have a fundamental adverse impact on the openness of the Green Belt. Erroneous justification of housing requirement for Green Belt release

Green Belt boundaries should only be altered in 'exceptional' circumstances. This land has been identified as the Most Sensitive Green Belt. The Calderdale Local Plan, which has suffered from a democratic deficit throughout its many iterations, sets a target for housing based on pre-Brexit demographic evidence of Objectively Assessed Need (OAN). This means that the Green Belt as designated in the current UDP has had to be reviewed. The OAN is far too great and as it relates to out-of-date population projections used in Strategic Housing Market Assessment (and update) that have been superseded by lower projections in more recent Office of National Statistics releases that would result in a much lower housing target and the reduce the need to release the number of Green Belt sites. Further, the ambitions of the Council for annual jobs growth over a 16 year period characteristic of a constant 'boom' inflate the requirement well beyond the realistic possibility of actual delivery. It is not responsible to allocate land, including a significant amount of Green Belt release, to meet inflated housing targets based on out-of-date household projections and ambitious and continual jobs growth. The housing target needs revisiting to model scenarios reflective of evidenced-based jobs growth (rather than ambitions), up-to-date household projections (including post-Brexit population projections) and the priority to contribute to sustainable development that does not harm the environment (including the Council's Climate Emergency commitments). The Calderdale Local Plan has been overtaken by events both demographically, economically and environmentally. At this point, the Council is proposing to adopt a Local Plan that runs entirely against the corporate ambitions of the authority. It is simply the case that no plan at all (and reliance on the NPPF & NNPG to direct new developments, which would include the protection of sensitive Green Belt) would be better than the proposed Local Plan that is under examination. Disproportionate

The most recent revisions to the Local Plan in response to the Inspector's letter include the addition of more Green Belt sites (including LP0026, LP0177, LP0952, LP1625) for release, which represents further unsustainable development as a disproportionate amount of the new homes proposed are across just four sites in Greetland. Indeed, 1,041 additional units of the 1,708 on these new housing sites (over 60%) are proposed in the Elland area alone. There has been substantial development of land in both Greetland and Elland in recent years. This cumulative development means that the land on Saddleworth Road is the only remaining parcel of the original Green Belt still in agricultural use. Development of the site would erode the visitor's understanding of the extent of the original manorial lands that Greetland covers.

**Unsustainable Development** The Council's Sustainability Appraisal process to support the release of the site is inadequate. The site report states that the assessment of SA7 is 'Negative' and marked 'RED'

commenting that "Overall the impact is negative as the site is greenfield and lies within flood zones 2 and 3". The site should be excluded on this conclusion alone, particularly within the wider context of the Council's recent declaration of a Climate Emergency and recent flood events. Further, the report does not grapple with the issue in the overall conclusions inadequately noting that "with regards to SA7 and flood risk, the impact is negative as the site is greenfield and lies within flood zones 2 and 3" with no specific mitigation measures identified. This does not come anywhere close to an adequate assessment to justify release for development. The Sustainability Appraisal for the Local Plan has not been mapped or measured. The benefits of, or the opportunities for, the provision of ecosystem services by the Green Belt land directly around the urban environment are unrecorded. Section 39 of the Planning and Compulsory Purchase Act 2004 states that a local authority exercising their plan-making functions must do so with the objective of contributing to the achievement of sustainable development. Action 5 of the EU Biodiversity Strategy to 2020 requires member states to map and assess ecosystems, whilst the Minister of State for the Environment reiterates the necessity to map and value the natural capital that make up ecosystem services, specifically in urban environments, in order to improve sustainable planning. Further, the NPPF sets out a presumption in favour of sustainable development and advises that the planning system should contribute to and enhance the natural and local environment by a number of measures that include 'recognising the wider benefits of local ecosystems. Wildlife Paragraph 175 of the NPPF states that, 'When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts)' which the community is immediately able to jump in with stating that this cannot be said to be the case in the Calderdale Local Plan, as land was removed from Stainland, which is far less sensitive, in terms of the risk development would pose to wildlife, biodiversity, habitat and landscape. In this way the land in Greetland put into the Local Plan is not compliant with the NPPF. Developer Influence Profit should not dictate planning policy, at a great cost to the environment. In relation to the rest of Calderdale, house prices in Greetland are very high. The developers have not expressed an interest in the overwhelming amount of brown field land available in Calderdale, because the return on investment is so much higher when development is passed in beautiful Green Belt land, set within a village connected to high house prices. The developer is further enabled to do this because it has a monopoly on the large-scale building development taking place in Greetland. Plans have been drawn up for the different sites within Greetland, the sites have been given different codes, and yet the land is almost entirely unseparated by anything physical; essentially, to this community, the separate plots are one piece of land, irrespective of who owns the land on the land register- the development will be concentrated in one place. Different developers have been assigned to the various codes given to our continuous area of Green Belt, however, when this is examined further, it becomes apparent that the developers largely belong to the same parent company. How can Calderdale Council resist pressure from this monopoly situation? They are already under time constraints to designate land to the Local Plan. This is a toxic situation for Calderdale, and thus renders it impossible for the council to deliver the right homes in the right places. The Local Plan in Calderdale has become entirely about developer profit, and not at all about growing the local economy for local people. Severe Lack of Infrastructure Greetland School is an Academy and therefore it is not obliged to expand. In the Council's individual assessments of the sites which resulted in them all being filtered and not taken forward for housing, the consultation from Highways England advised that the development of the scale envisaged would have a significant adverse traffic impact on the Strategic Road Network. Given this how can the sites now be put forward for allocation for housing when nothing has been done to either challenge those comments or address them? The sites in Greetland have not had traffic assessments carried out. Sites elsewhere in Calderdale have been filtered from the Local Plan due to traffic constraints. Given the existing levels of high congestion at the West Vale traffic lights, why has assessment not been carried out? Why has air pollution not been measured? Is it because the sites in Greetland are too appealing to developers, given the high house prices in the area, and something like a traffic assessment would throw a spanner into the works, as it were? Where is the Traffic Plan in the site reports for these sites? These sites have been allocated without



appropriate assessment of local road networks. To say that the cumulative traffic impact is being assessed is not sufficient, especially given the scale of the proposed development. To increase the amount of traffic on Saddleworth Road, when it is already so heavily congested, and with a high volume of HGVs, by any amount of traffic, without a proper assessment is not a sustainable practice in planning terms. Heritage No assessment has been made of heritage impact The site assessment reports carried out in advance of the 2018 Publication Draft identified other areas of policy conflict with all three sites ; in particular heritage, open space and sustainability. It was at that time recommended that none of the sites on Saddleworth Road should be allocated until an assessment had been made of the heritage impact. To our knowledge that has not occurred. The sites were identified as providing valuable natural and semi-natural open space. This would be lost if the sites were allocated for housing. In terms of sustainability, a negative factor in not bringing the sites forward in the 2018 consultation was the distance to a railways station (in excess of 2kms). By definition that negative factor remains and forms part of the reason why other potential sites in the area have not been brought forward (such as site LP1089 on Rochdale Road). Open Space There would be complete loss of natural and semi-natural open space Air Pollution The homes proposed in Greetland will significantly add to air pollution. This goes against The Clean Air strategy 2018 adopted by Calderdale Council; yet to build these houses would put our children who attend Greetland School and Sunnybank Pre-School at higher risk of ill health due to further increasing air pollution as their playground is only a couple of feet away from the already very busy congested main road which carries a lot of heavy good vehicles, due to a 24 hours recycling plant, which is only accessible by Saddleworth Road ; the road the development is intended for. Inflated housing target at the cost of great environmental harm Calderdale have based their growth on the WYCA anticipated employment figures (which is between 35,000 to 50,000 new jobs for the LeedsCity Region as a whole The Leeds City region has produced below average employment over the past 30 years but in their Strategic Economic Plan they envisage well above average growth in the next 15 years. This is extremely optimistic given that the current UNEMPLOYMENT rate in Yorkshire is 4.3% which is the second highest of any region in the UK and is currently increasing. If Calderdale's economic growth was more accurate, there would be no need to destroy precious Greenbelt land. The Council have proposed a number of alterations to its Green Belt boundaries to simply meet an inflated housing target at the cost of great environmental harm. The NPPF is clear that Green Belt should only be altered in exceptional circumstances through the preparation or review of a Local Plan. Where it is necessary to consider revision of the Green Belt, this review should be robust in its justification for any alteration ; which is critically missing. The critical importance of early and meaningful engagement and collaboration with communities in producing Local Plans, particularly where this involves altering Green Belt boundaries has not been undertaken as the site has been parachuted into the plan-making process during hearing sessions. This constitutes a serious breach of procedural compliance. A local pressure group has been set up at the last moment to attempt to deal with these issues locally and has attracted a significant amount of support. However, the community has not been given the opportunity to produce a Neighbourhood Plan. Neighbourhood Plans can be used by local people to positively shape development in their area, including establishing principles for how former Green Belt sites are developed. Summary All of the reasons why these sites were not brought forward at the Publication Draft stage remain just as relevant now. There has been no further assessment of any of the significant constraints which resulted in the sites being filtered at that stage. The only reason for bringing them forward for allocation now is based on a simple exercise of responding to a requirement to increase the housing supply. There is no justification for allocating these sites given the flood zone allocation and evidence of flooding and given the fundamental conflict with the Green Belt Review in 2017. No consideration has been given to the potential to bring forward other sites in the area that do not carry these fundamental problems. No consideration has been given either to the lack of infrastructure available in Greetland to accommodate such a significant level of new housing. The function of the planning system is to facilitate sustainable development that makes a positive contribution to the environment. It is not the role of the Council to recklessly release demonstrably unacceptable sites within the Green Belt to meet a housing target. The Inspector's letter of 16 July 2019 to the Council notes (Para. 14) that "Local Plans should meet objectively

assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits". This is the undoubtedly the case here. No sensible phasing options are proposed related to release of the most sensitive Green Belt sites upon the requirement to demonstrate a five-year housing land supply even if the release could be justified. It is illogical to allocate Green Belt sites in Flood Risk Zones 2 and 3 for development before brownfield sites are fully exhausted. The immediate release of the site for development is simply not a sensitive approach to the release of Green Belt land even if it were to be appropriate. Later, the Inspector asked the Council to review the option of 'the supply of more suitable and available sites elsewhere' understanding this to be an option, however, the further work on the additional sites considered (incorrectly by the Council) to be 'suitable and available' are not, in fact, suitable and, in any case, it has been revealed that this option on all sites on Saddleworth Road, Greetland (identified below) is simply not sustainable and the proposal is unsound. LP0026 - The Gate Farm, Saddleworth Road, Greetland, Elland, HX4 8NW LP0177 - Land adjacent Ellistones Place, Saddleworth Road, Greetland, Elland, HX4 8NW LP0952 - Land at New Gate Farm, Saddleworth Road, Greetland, Elland LP1625 - Land to the west of, Silverdale Terrace, Greetland, Elland, HX4 8NQ

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

Sound Reason:

The site requirements relating to the release of the land from Green Belt is not legally compliant, adequately prepared, fully justified or consistent with National Planning Policy Framework (NPPF) and accompanying Guidance (NPPG). Procedural and Legal Compliance Issues I am concerned that Calderdale council has not adhered to legislation set out in The Climate Change Act 2008 (2050 Target Amendment). I am not able to see any evidence of additional measures to respond to climate impacts of above-trend growth in employment and housing. In addition to this, I am concerned about issues actually acknowledged by the Council itself, particularly regarding traffic impacts and flooding. For issues surrounding the proposed development, regarding traffic and flooding, it would appear that the proposal is not, according to the NPPF, sustainable. When the harm identified is taken into account, the proposals are clearly deemed unsustainable. The land in this site is also unsuitable for development due to issues relating to Green Belt and Heritage Assets, and recent planning case law determined by High Court Judgements relating to the siting of Listed Buildings. Further to this, the proposals are not supported by Housing Infrastructure Fund (HIF) from Homes England, and the inadequacy of existing infrastructure to accommodate this level of growth confirms that the proposals are unsustainable. This has even been publicly recognised by our local MP, Craig Whitaker. Flooding Certainty Part of the site is allocated as Zone 3a and is at the bottom of the chain for development, with development only acceptable if sequential and exceptions tests are passed. There have been no such tests carried out. There is evidence that the site floods both severely and routinely. The way in which this happens actually protects property and infrastructure from harm caused by flooding. Mitigation can not equal or surpass the work currently done by this land as it stands. Black Brook routinely bursts its banks, taking hold of entire expanses of meadow land, posing significant danger to both life and property. There is extensive photographic and video evidence of this. Our community begs you to recognise that there is not a risk of flooding in this area, but a certainty of it. The way in which this site faces routine flooding has been well documented on the regional news. National news is now starting to contact the pressure group. This is something we have not gone looking for, but instead finds us, due to our level of flood risk, or 'flood certainty' as it is now known within the community. We are a small village in Calderdale Yorkshire, why are we being contacted by national media outlets? The issues we face here are real and they are huge. The entire span of land on LP0177 including South of Greetland Academy School was severely flooded in February 2020 (evidence attached). Greetland Pressure Group has attracted attention from both local and regional press and TV with regards to recent flooding and proposed development. This land routinely floods and would leave any proposed development at risk along with any access roads. Development sites LP0177, LP0026, LP0952, LP1625 are critically important in alleviating any further flooding issues by soaking and storing surface water run off

from the large amount of natural springs in the area. The Army was even called into Calderdale, in a bid to help protect people and property from yet another severe flood, also in February 2020. The way in which the Calder Valley routinely experiences flooding can be best understood by Tim Swift's, Calderdale Council Leader, words when he urged the government to grant Calderdale urgent assistance. Swift would like to see Calderdale recognised as a 'Tier 1' authority, which would entitle Calderdale to extra funding support, as 'Calderdale is one of a small number of areas in the country at "sustained risk" of flooding.' The head of our council has even recognised the significant threat we face in this area. The topographical context of the proposal in Greetland lends itself to increased flood risks, due to the abundance of natural springs, the water course, and the steep valley sides. All of the factors that contribute towards flooding are against us. Flooding in this part of Greetland is a certainty that grows year on year with the ever-increasing threat of Climate Change. The way in which this valley, with its steep sides, floods is a natural hazard. Residents on Woodfield Drive had to take action to prevent their homes from flooding in February 2020, and not for the first time either. We have photographic evidence of how this is a routine battle that residents face, and not enough is being done to help prevent this from happening in the future. To build on this land would be to sign residents and the community to an unbearable, unavoidable fate. The NPPF states that, 'due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere.' The topography of our area would not allow for it to be any other way than to increase the risk of flooding to the existing community. The sloping grassland, the trees and the flat flood plains of the land put forward in Greetland in the Local Plan retain an immeasurable amount of water when it really matters. No amount of 'mitigation' can compete with this. To build on this land would have catastrophic and irreversible ramifications, and not just for the immediate area, but for the areas further downstream currently protected by this precious land and the way it currently functions. Prime Minister Boris Johnson has even, on multiple occasions in the press, called for councils to stop allowing building on flood plains. Part of Site LP0177 lies within flood zone 3A ; the highest classification of flood risk in terms of land that could potentially be considered appropriate for development. The zone 3A is immediately adjacent to the western and southern boundaries of Woodfield Drive. The land immediately adjacent to the whole southern boundary of the proposed 3 allocation sites is also allocated as flood zone 3A. The photographs that are attached to this submission show the flooding that has occurred on the land. Given that the land is not only identified as being at risk of flooding but is also evidenced as having flooded, there is no justification in land drainage terms to bring these sites forward for housing. Paragraph 155 of the NPPF clearly states that, -"Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk" In putting these sites forward the Council is ignoring the policy requirements of the Framework. The reports compiled by the Council for all four sites on Saddleworth Road when putting together the Publication Draft version of the Local Plan in 2018 concluded that all three should be filtered (i.e. not taken forward as housing allocations) because of ; amongst other things ; flooding and drainage issues. Sequential and exceptions tests would have been necessary to demonstrate that the sites were suitable for and safe to develop. Although the Planning Inspector identified an insufficient supply of housing land following the Stage 1 examination process, it should not simply follow that additional sites are now allocated without a thorough assessment being made as to their suitability to counter the reasons why they were initially filtered. The four sites on Saddleworth Road seem to have been put forward as a simple response to the Inspector's comments with no consideration of the flooding and drainage issues associated with the land. It is clear that there are blurred lines of responsibility and accountability when serious flooding issues arise between Developers, Councils and the Environment Agency. We need accountability when reckless planning leads to catastrophic flooding issues. Green Belt The Green Belt Review carried out in 2017 considered all three of the sites ; reference numbers 065 and 339 in the review. The conclusion of this review was that all of the sites performed strongly in terms of their Green Belt function, meeting at least 3 of the 5 purposes of including land in the Green Belt. Those 3 purposes were: To prevent neighbouring towns from merging into one another; To assist in

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knowledge that has not occurred. The sites were identified as providing valuable natural and semi-natural open space. This would be lost if the sites were allocated for housing. In terms of sustainability, a negative factor in not bringing the sites forward in the 2018 consultation was the distance to a railway station (in excess of 2kms). By definition that negative factor remains and forms part of the reason why other potential sites in the area have not been brought forward (such as site LP1089 on Rochdale Road). Open Space There would be complete loss of natural and semi-natural open space Air Pollution The homes proposed in Greetland will significantly add to air pollution. 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It is not the role of the Council to recklessly release demonstrably unacceptable sites within the Green Belt to meet a housing target. The Inspector's letter of 16 July 2019 to the Council notes (Para. 14) that "Local Plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits". This is the undoubtedly the case here. No sensible phasing options are proposed related to release of the most sensitive Green Belt sites upon the requirement to demonstrate a five-year housing land supply even if the release could be justified. It is illogical to allocate Green Belt sites in Flood Risk Zones 2 and 3 for development before brownfield sites are fully exhausted. The immediate release of the site for development is simply not a sensitive approach to the release of Green Belt land even if it were to be appropriate. Later, the Inspector asked the Council to review the option of 'the supply of more suitable and available sites elsewhere' understanding this to be an option, however, the further work on the additional

sites considered (incorrectly by the Council) to be 'suitable and available' are not, in fact, suitable and, in any case, it has been revealed that this option on all sites on Saddleworth Road, Greetland (identified below) is simply not sustainable and the proposal is unsound. LP0026 - The Gate Farm, Saddleworth Road, Greetland, Elland, HX48NW LP0177 - Land adjacent Ellistones Place, Saddleworth Road, Greetland, Elland, HX4 8NW LP0952 - Land at New Gate Farm, Saddleworth Road, Greetland, Elland LP1625 - Land to the west of, Silverdale Terrace, Greetland, Elland, HX4 8NQ

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

Duty to Co-operate Reason:

Suggested Modifications:

Remove the Green Belt land on Saddleworth Road from the Local Plan; LP0026 - The Gate Farm, Saddleworth Road, Greetland, Elland, HX48NW LP0177 - Land adjacent Ellistones Place, Saddleworth Road, Greetland, Elland, HX4 8NW LP0952 - Land at New Gate Farm, Saddleworth Road, Greetland, Elland LP1625 - Land to the west of, Silverdale Terrace, Greetland, Elland, HX4 8NQ

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5610767>

Comment ID **HRU1781**

Site ref (if applicable):

Person ID: **960100**

Name: **Mrs Jessica Lawson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

This land is prone to flooding and this would breach the legislation around only building on flood risk land in exceptional circumstances.

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

Sound Reason:

There is no sustainable infrastructure plan around this development. This breaches Paragraph 98 and 80 of the NPPF around the protection of open space and prevention of urban sprawl.

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

Duty to Co-operate Reason:

Flood risk area- difficult for homeowners to obtain insurance

Suggested Modifications:

Remove from local plan

Comments:

Comment ID **HRU1790**

Site ref (if applicable): **LP1625**

Person ID: **1243145**

Name: **Mrs Chloe Smith**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I CONSIDER ALL OF THE FOLLOWING OBJECTION POINTS TO BE RELEVANT FOR ALL OF THE PROPOSED DEVELOPMENTS IN THE GREETLAND AREA- LP0026, LPO177, LPO952, LP1625. The following points cover all four sites as they are in such close proximity to each other and the negative implications are the same for each site. The local plan does not comply with the National Planning Policy Framework, at the beginning of the policy the three overarching objectives are mentioned: a) an economic objective ; to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure; b) a social objective ; to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and c) an environmental objective ; to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy. These three overarching objectives contain lots of points that the local plan fails to comply with. This greenbelt land is NOT the right type of land in the right place. The provision of the infrastructure will be considerably compromised by the local plan, the area cannot cope with increased volume of traffic on the roads. The local plan does not support communities health, social and cultural well being, by taking away an area of land that is used for walkers, children to get fresh air this is definitely the opposite. The health of the community will be compromised by the huge traffic pollution increase. It mentions 'open-spaces' in the social objective, the open-spaces in Greetland will be lost if the developments are to go ahead, thus the opposite of this point. The third objective mentions contributing to protecting and enhancing our natural environment. The local plan is on greenbelt land that would destroy the homes of the local wildlife corner, not protecting in any way! For these reasons, along with many more I do not consider the local plan to be sound or legally complacent in any way. I do not consider the plan to be sound and have the following reasons for my objections: -Greenbelt and wildlife -Pollution and traffic congestion - Flooding - Infrastructure Greenbelt and Wildlife To quote the NPPF 136 Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified . I do not believe that the reasons for the local plan are exceptional circumstances and are definitely not justified or evidenced. This land should be protected for the reasons it was made Greenbelt land in the first place. This is a wildlife corner home to many different wildlife species. This is land used by walking groups and children, it is good for health and well being to walk in the open-air and with mental health issues on the rise it is vital that this area of free space is not lost. NPPF 174 174. To protect and enhance biodiversity and geodiversity , plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity56; wildlife corridors and stepping stones that connect them; " By building on greenbelt land the local plan is not protecting or enhancing the wildlife-



rich habitats that are contained on this fabulous land. To quote the NPPF 137 137- makes as much use as possible of suitable brownfield sites and underutilised land; Brownfield sites- There are plenty of brownfield sites in Halifax that need to be considered first, I have looked at the Brownfield Register and it is not updated, showing a lack of priority for this. I do not feel that the suitable Brownfield sites have been considered first. There is a demolished mill at the bottom of Saddleworth Road, surely this should be a site for development before Greenbelt land! Pollution and Traffic Congestion 180. Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment . The location at the moment is already horrifically congested. West Vale is a bottle-neck of traffic especially at peak times. The traffic pollution created by the extra proposed number of houses will most likely cause danger to health, especially to the children attending the Pre school and Infant school on Saddleworth Road. This goes against the governments strategy on air quality. Planning and flood risk 155. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere . The proposed area of development is on an area prone to flooding. The weekend of the 10 th February saw extensive flooding in this area. There is lots of photographic evidence to show that the proposed area for development will already be prone to flooding. Where will all this water go ? The extreme current weather conditions have already proven to have devastating consequences in Calderdale. Calderdale Council have declared a 'Climate Emergency' but then are planning on building houses on flood plains, this will increase flood risks in West Vale and Elland. This is ludicrous. Infrastructure As there is only one main road in and out this is going to cause major congestion issues. The other roads into Greetland are often narrow and already very congested, such as in Norland. The proposed plans on site LP0026 will cause major issues given that already the road is very narrow and two cars have trouble passing each other as it is. If this is to be an access point for an extra 60-70 houses it will definitely cause more issues than it already does. Greetland is currently a village, not a town. There are not enough shops to deal with the amount of proposed houses. I am currently on a waiting list for the local dentist, there is already a waiting list pages long. There is not enough space at the Dentist or Doctors to deal with this vast number of new residents. The local schools are also already full. This does not comply with the NPPF statement following - 94. It is important that a sufficient choice of school places is available to meet the needs of existing and new communities The local plan will therefore have a disastrous effect on the infrastructure of Greetland itself. The local bus service is currently inadequate for the area. I worry that when my son is of high school age he will be unable to get a place on a school bus, are there plans to expand this service ? I do not believe that there is a shortage of houses in this area or an unemployment problem or an issue of homeless families ? Greetland can not possibly cope with the demands and negative impact that these developments will bring on a village. I would like to see the four sites in the Greetland area be removed from the local plan. They do not comply with the National Policy Planning Framework and are not sound.

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

Sound Reason:

I CONSIDER ALL OF THE FOLLOWING OBJECTION POINTS TO BE RELEVANT FOR ALL OF THE PROPOSED DEVELOPMENTS IN THE GREETLAND AREA- LP0026, LPO177, LPO952, LP1625. The following points cover all four sites as they are in such close proximity to each other and the negative implications are the same for each site. The local plan does not comply with the National Planning Policy Framework, at the beginning of the policy the three overarching objectives are mentioned: a) an economic objective ; to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure; b) a social objective ; to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be

provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and c) an environmental objective ;to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy. These three overarching objectives contain lots of points that the local plan fails to comply with. This greenbelt land is NOT the right type of land in the right place. The provision of the infrastructure will be considerably compromised by the local plan, the area cannot cope with increased volume of traffic on the roads. The local plan does not support communities health, social and cultural well being, by taking away an area of land that is used for walkers, children to get fresh air this is definitely the opposite. The health of the community will be compromised by the huge traffic pollution increase. It mentions 'open-spaces' in the social objective, the open-spaces in Greetland will be lost if the developments are to go ahead, thus the opposite of this point. The third objective mentions contributing to protecting and enhancing our natural environment. The local plan is on greenbelt land that would destroy the homes of the local wildlife corner, not protecting in any way! For these reasons, along with many more I do not consider the local plan to be sound or legally complacent in any way. I do not consider the plan to be sound and have the following reasons for my objections: -Greenbelt and wildlife -Pollution and traffic congestion - Flooding - Infrastructure Greenbelt and Wildlife To quote the NPPF 136 Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified . I do not believe that the reasons for the local plan are exceptional circumstances and are definitely not justified or evidenced. This land should be protected for the reasons it was made Greenbelt land in the first place. This is a wildlife corner home to many different wildlife species. This is land used by walking groups and children, it is good for health and well being to walk in the open-air and with mental health issues on the rise it is vital that this area of free space is not lost. NPPF 174 174. 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There is a demolished mill at the bottom of Saddleworth Road, surely this should be a site for development before Greenbelt land! Pollution and Traffic Congestion 180. Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment . The location at the moment is already horrifically congested. West Vale is a bottle-neck of traffic especially at peak times. The traffic pollution created by the extra proposed number of houses will most likely cause danger to health, especially to the children attending the Pre school and Infant school on Saddleworth Road. This goes against the governments strategy on air quality. Planning and flood risk 155. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere . The proposed area of development is on an area prone to flooding. The weekend of the 10 th February saw extensive flooding in this area. There is lots of photographic evidence to show that the proposed area for development will already be prone to flooding. Where will all this water go ? The extreme current weather conditions have already proven to have devastating consequences in Calderdale. Calderdale Council have declared a 'Climate Emergency' but then are planning on building houses on flood plains, this will increase flood risks in West Vale and Elland. This is ludicrous. Infrastructure As there is only one main road in

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

Duty to Co-operate Reason:

Suggested Modifications:

I would like to see the four sites in the Greetland area be removed from the local plan. They do not comply with the National Policy Planning Framework and are not sound.

Comments:

Additional Evidence Link:

Comment ID **HRU1811**

Site ref (if applicable):

Person ID: **1243413**      Name: **Mrs Debbie Grundy**      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 write to strongly object to the above proposed housing development which is ill considered on the following grounds:- 1.Flood Plain This development includes building on a known flood plain. Recent weather events resulting in the flooding of adjacent fields have demonstrated that the land is not suitable for housing development. Flooding in the UK is likely to become more common due to the effects of climate change. Building on areas prone to flooding has led to the devastating floods that have engulfed and continue to engulf towns such as Sowerby Bridge, Hebden Bridge and Mytholmroyd. Where there is a significant loss of trees and grass as would be the case in this development the ground is unable to hold

and absorb water and will therefore flood. This is not an acceptable risk for our community.

2. Infrastructure The additional road traffic resulting from this proposed development will mean unsafe road conditions with traffic unable to move freely. West Vale is a huge issue in terms of traffic congestion currently and the road system is not fit for purpose. A development of this size would make journeys for local residents and other motorists using the roads intolerable. The impact of this amount of housing on our local services such schools and doctors surgeries has not been taken into account nor has the resulting pollution that this would create.

3. Environmental disturbance There will be a huge impact on the landscape with damage to the natural habitats of wildlife and resulting loss of biodiversity in the area. The cumulative effects of the above will have a significant negative impact on the local area and overload local services and amenities. This is a green belt area. The local community will be deprived of green space which is used for families as recreation and is widely recognised as necessary for health and well being.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1814** Site ref (if applicable):

Person ID: **1245741** Name: **Ms Sue Thornton** 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:

LP1625 Land to the West of Silverdale Terrace Sustainable Development The planning system is there to facilitate sustainable development. I am not opposed to the building of houses but support the building of the right type of homes in the right places. I am not convinced that other sites (brown-field and in-filling of existing urban areas) throughout Calderdale have been fully utilised. An undisclosed number of houses on this site in addition to over 600 new homes in a village of this size is disproportionate and would significantly alter the existing cohesive community. Green Belt One of the original purposes of designating this land as Green Belt, was to safeguard the countryside from encroachment. This green land provides a definite boundary between this semi-rural community and others ; it prevents URBAN SPRAWL. The use of Green Belt land would have an adverse impact on this area which SIGNIFICANTLY outweighs the benefits. EXCEPTIONAL CIRCUMSTANCES have not been fully evidenced or justified for the decimation of this stretch of Green Belt land. Flooding The land in this part of Greetland provides an area for the rainfall to soak away as it cascades down the hillside. There are numerous underground springs and streams higher up, the water from which has to flow somewhere. Where these complex water systems have been disrupted by

other (much smaller) building projects, the knock-on effect lower down has been unpredictable. Householders have found springs appearing in their gardens or streams flowing through their cellars. If the water were not allowed to soak into this land, the effect, further down Black Brook towards West Vale and Elland would be devastating. Traffic Public transport, in this area, is not frequent so most people rely on their cars. If over 600 houses are built in total, that would mean a potential 1200 extra cars on Saddleworth Road. The roads, particularly the two junctions at West Vale (which cannot be avoided) are unable to cope with the present volume of traffic at either end of the working day. There is no space to alter these junctions in any way so extra traffic would cause massive congestion. Air Pollution Extra traffic along Saddleworth Road will cause a huge increase in air pollution. As the vehicles pass close to Sunnybank Pre-School and KS1 of Greetland Academy, this toxic air will be taken into vulnerable developing lungs, probably causing life-long health problems for the children in our community. Infrastructure The infrastructure of the area cannot support a possible 600 more families, we do not have capacity in the schools or the GP surgery. It is already impossible to register with an NHS dentist. Ecology The wildlife corridor along this stretch of Green Belt land has an abundance of fish amphibians, birds and small mammals. Not only will the air pollution affect them, but noise, human presence and light pollution. Added to this, the physical disturbance during the building phase ; this could lead to the loss of many of these creatures from the area FOR EVER. As we know, any change to our ecology can lead to unforeseen consequences in years to come. Open Space Open space has many benefits to the community ; it is good for our mental and physical well being. The footpaths and narrow lanes in this area are well used by families, dog-walkers, bird watchers etc. Please do not deprive future generations of this wonderful resource.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1829**

Site ref (if applicable):

Person ID: **1246060**      Name: **Ms Jacqueline Peter**      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:

Objection. This area is of historical importance (medieval skull ) and maybe more to be found in the future not to mention flooding air pollution etc .

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1835**

Site ref (if applicable): **LP1625**

Person ID: **1130746**

Name: **Mrs Jane O'Kane**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

I feel Calderdale Council has failed in its duty to inform residents of these plans and therefore given them little time to object.

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

Sound Reason:

I strongly object to any development on the above site. Greenbelt NPPF paragraph 143 states: - "inappropriate development is harmful to Greenbelt and should not be approved except in very special circumstances" I have seen no evidence from Calderdale Council to justify - "special circumstances" This area is a significant area for wildlife ; bats, owls, badgers, foxes, herons, etc. If we lose this area of Greenbelt land we lose the wildlife forever. Open green spaces are important for the physical and mental well being for all. Flooding As a resident of Saddleworth Road, I am well aware of the flooding which occurred in December 2015 and again in February 2020 and the devastation it caused local residents and businesses in the area. There are numerous natural springs in the hillside from Stainland, Barkisland and Greetland which run through this land. Should the land be developed where will this water go? It will move further down the valley causing flooding to other areas. The land is a natural flood plain and as such it should be left to do its job. Congestion The junction of Saddleworth Road/Stainland Road and Rochdale Road/Stainland Road is already significantly congested. Increasing housing will just exacerbate the ongoing problems with traffic congestion and pollution. Infrastructure Local schools are already full to capacity. The local GP surgery would not cope with the extra patients. Urban Sprawl There is a risk that urban sprawl will further encroach into the surrounding countryside. This land in Greetland falls within the wider area of Elland and there is a disproportionate allocation to Greetland than other parts of the Elland region. Stainland having no housing allocation at all.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1846**

Site ref (if applicable):

Person ID: **1246146**

Name: **Mr & Mrs Linda & Chris  
Lister**

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 am writing to object to the plans being put forward for housing in Greetland. The village does not have the schools, doctors and road system to handle further development and families. Currently the primary school already has 2 classes per year and does not have space for more children. Indeed I have heard that the Sunnybank Annex applied for planning a few years ago for an extension and was knocked back at it was a GREEN BELT AREA. Getting an appointment at the doctors is a struggle at times already at the moment. Lastly driving from Greetland down to Westvale or vice versa is a very long process at peak times and would not cope with even more traffic. The area has outstanding natural beauty with numerous amounts of wildlife that thrive in the open fields and can often be seen in the early morning and evening. The land has many floodplains where the proposed houses are due to be built - which have been highlighted recently with the bad weather. Therefore, without new services - including drainage, schools and road system this proposal is unbelievably bad and should not be considered.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1850**

Site ref (if applicable): **LP1625**

Person ID: **1246154**

Name: **Jenni Crystal**

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 am writing to register my objections to the following planning proposals: LP0026, LP0177, LP0952 and LP1625. The four sites are incredibly close together, and stem off the same main road leading to West Vale, therefore I feel the following objection points apply to all four sites. The most critical reasons for objections are as follows: **FLOOD PLAIN** ; The area proposed is on a natural flood plain, and natural springs flowing down the Greetland hillside culminate at the proposed site. There is photographic evidence that local houses are subject to flooding already, so any further building would have a catastrophic effect on flooding in the local area, West Vale, Elland and beyond. I have attached photographic evidence to support this from the 9<sup>th</sup> February 2020. Just one of two incidents when Black Brook has burst its banks in the last few weeks. There is a concerning lack of flood prevention plans in any of the four local site proposals. Building on any of these sites to the extent proposed would increase the speed of water run off massively. For the developers to state they will not build on the parts of the fields which flood is irrelevant. It is the destruction of the Green belt land that is the issue, not which part of it they are willing to build the houses on. The council should be looking at helping to slow the flow of water using natural processes , not replacing essential greenbelt land with concrete! **INFRASTRUCTURE** - The infrastructure is simply not geared up to cope with 600+ houses. Traffic is already chaotic in West Vale and has been for some time. Both Saddleworth Road and Stainland road are used as alternative routes from the motorways and can hardly cope with the constant increase in traffic which will only increase over the years to come. The area could not cope with another 1200 + cars from the proposed 4 build sites in Greetland. The local school has no capacity to extend, and has expressed several times that it is not willing to extend. **POLLUTION / AIR QUALITY** ; The pollution caused from a further potential 1200 cars on the roads is unimaginable and the health of the Junior School children would be at a high risk as would the whole community. It is a fact that increased pollution would seriously affect the health of our children both now and in future generations. Not to mention the noise pollution that would be caused by the constant building both around and near the school. **GREEN BELT** ; This is green belt land and as such, should be protected. Why aren't the council considering all the 'brown field' sites as a priority? This is a wildlife corridor - there are many protected species of animals and birds in the area, and it is used as a nature walk by all the community. I appreciate that there has to be a certain percentage of new housing developments in every village and town, which is currently going on at an acceptable rate, but proposing to build 600+ houses in this area is not acceptable on any level. This would cause catastrophic consequences to the area of Greetland and surrounding villages. Including the properties of current residents living close to Black Brook.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5634586> ; <http://calderdale-consult.objective.co.uk/file/5634587> ; <http://calderdale-consult.objective.co.uk/file/5634585> ; <http://calderdale-consult.objective.co.uk/file/5634584>

Comment ID **HRU1851**

Site ref (if applicable): **LP1625**



Person ID: **1246092**

Name: **Liz Rushby**

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 amount of water running down the road above and below this site will require a significant redirection if houses are built on the land. If you visit this area especially now with all the wet weather there has been. The land is where people go to walk their dogs and have a quiet stroll. I think we should protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity. We should promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity. However this cannot be said to be the case in the Calderdale Local Plan, as land was removed from Stainland, which is far less sensitive, in terms of the risk development would pose to wildlife, biodiversity, habitat and landscape. In this way the land in Greetland put into the Local Plan is not compliant with this.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1857**

Site ref (if applicable): **LP1625**

Person ID: **959343**

Name: **Mr David Best**

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 am writing to object to the proposed development on the above site. The development of this site together with the planned development of sites LP0026, LP0952 and LP0177 would result in

disproportionate increase in the population of Greetland resulting in a shortage of school places, an increase in traffic movement in an area which is already gridlocked at peak times. There would consequently be an increase in air pollution. In addition there would be intolerable pressure on doctors and dentists in the area. Part of the proposed overall development is to be built on a flood plane which would cause more problems further down the Calder Valley.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1863**

Site ref (if applicable): **LP1625**

Person ID: **1243189**

Name: **Ms Lisa Simmonds**

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:

The following applies to all the above sites equally: LP0177, LP0026, LP0952, LP1652 These areas are Greenbelt. This is sacred area to the local residents and is fantastic area to exercise for free, enjoy the open space, fresh air, spot wildlife, relax and get away from the stresses and strains of daily life. It is essential this is not taken away from residents including children to enjoy. This is a rural area and must remain so. There is no excuse for building on Greenbelt land. Does the Council realise this is a wildlife corridor? Not just birds (which includes owls, kestrels and woodpeckers) there are deer, newts, bats, foxes, badgers, hares and all manner of animals live and roam here free in the knowledge they are safe, unharmed and treasured by locals. Their habitat cannot be destroyed and they cannot be safely moved without causing undue stress, anxiety and untold damage even death to these animals. They must also come before any development. All these sites are natural flood plains and do their job well of diverting water away from houses. This is Mother Nature's work and nothing man made can compete with this so it is essential these sites are left as they are. Where would the developer divert the water to? They would just divert it to cause devastation to other Greetland, West Vale, Elland and even Brighouse residents and businesses. Current residents and businesses must come first! Has the Council seen the videos and photos of all the flooding in these Greenbelt areas? These show just how unsuitable this land is and should be removed immediately. The solution is to identify suitable brownfield sites and also to include Barkisland, Stainland and Norland in the spread of the 600 houses, as that number is disproportionate to the number of houses currently in Greetland. Greetland residents will not take this lying down and Calderdale need to put their existing residents and wildlife first before any new development.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1872**

Site ref (if applicable): **LP1625**

Person ID: **1246316**

Name: **Linda Barker**

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:

Please please stop the building plans in Greetland site No LP0177, LP0026,LP0952,LP1625 These areas are green belt. I walk around all these areas with my dog. I and my family enjoy the wildlife, I personally have seen BATS, a PAIR of HERONS, two DEERS. These areas often flood and so act as a barrier to the houses that are near by. My doctor advises me not to take pills eg.HRT but to walk every morning in the country side for my wellbeing. This is ESSENTIAL for everyone so taking away these valuable areas for concrete building removed insects, wildlife and our mental health. Please hear my plea.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1876**

Site ref (if applicable):

Person ID: **1243588**

Name: **Mrs Kathryn Walsh**

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 no.LP1625 West of Silverdale Terrace 1.Air/noise pollution from increased traffic ,likely 2 cars per household. Proven that traffic fumes contribute to respiratory conditions Will impact on congestion of traffic in West Vale at peak times.Junction of Stainland/Saddleworth road will need major alterations 2.Flooding- Many springs in the Greetland hillside. Recent storms have caused many of these to alter course as wells have overflowed. Building on this land will cause further flooding down stream. 3.Infrastucture-local schools already over subscribed, dangerous parking on main road by school already causing problems. Extra pressure on Drs Surgery,already difficulty getting appointments.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1880**

Site ref (if applicable):

Person ID: **1246356**

Name: **Peter O'Kane**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I feel Calderdale Council has failed in its duty to inform residents of these plans and therefore given them little time to object.

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

Sound Reason:

I strongly object to any development on the above site. Greenbelt NPPF paragraph 143 states: - "inappropriate development is harmful to Greenbelt and should not be approved except in very special circumstances" I have seen no evidence from Calderdale Council to justify -"special circumstances" This area is a significant area for wildlife ; bats, owls, badgers, foxes, herons, etc. If we lose this area of Greenbelt land we lose the wildlife forever. Open green spaces are important for the physical and mental well being for all. Flooding As a resident of Saddleworth Road, I am well aware of the flooding which occurred in December 2015 and again in February 2020 and the devastation it caused local residents and businesses in the area. There are numerous natural springs in the hillside from Stainland, Barkisland and Greetland which run through this land. Should the land be developed where will this water go? It will move further down the valley causing flooding to other areas. The land is a natural flood plain and as such it should be left to do its job. Congestion The junction of Saddleworth Road/Stainland Road and Rochdale

Road/Stainland Road is already significantly congested. Increasing housing will just exacerbate the ongoing problems with traffic congestion and pollution. Infrastructure Local schools are already full to capacity. The local GP surgery would not cope with the extra patients. Urban Sprawl There is a risk that urban sprawl will further encroach into the surrounding countryside. This land in Greetland falls within the wider area of Elland and there is a disproportionate allocation to Greetland than other parts of the Elland region. Stainland having no housing allocation at all.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1895**

Site ref (if applicable): **LP1625**

Person ID: **954524**      Name: **Mr M Brown**      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 wish to raise an objection to the proposed building of c600 homes in the Greetland / West Vale area (Saddleworth Road, references above). The objection is principally based on the following points:- Planning, Infrastructure & Transport ; The current infrastructure in the area is already fully stretched with journey times and road capacity at significant levels. The plans have little to no capacity built in to accommodate the unprecedented increase in personal and commercial traffic that any approval would bring. The current road infrastructure could simply not cope. Any major increase in traffic would also bring significant road safety risks to the number of school children that walk through this area at peak times in the day. The combined residential capacity of the plans would bring turmoil to an already overcrowded, high-traffic area, commuter belt area of Calderdale. This is before consideration is even given to impacts on school capacities, doctor's appointments, etc in the area. Flooding ; Climate change projections strongly suggest we are going to experience more severe flooding in the future ; on this basis alone why suggest building on a naturally flood plain that allows fields to naturally flood, preventing damage to nearby homes and businesses? No amount of drainage solutions would alleviate this problem that naturally occurs in this valley. Building this amount of housing on a known flood plain that has very recently flooded (regardless of any provision for drainage) will only shift this known issue and cause unnecessary impacts on to other residents and businesses. Saving Green Belt ; This area was removed from the original plan due to this area being green belt land. Nothing has change over this time and the area continues to a wild life corridor for a variety of mammals, birds and insects. As a planet we cannot afford to lose any more of these habitats with plenty of brown or previous industrial land being available in

the Borough for development. Air Quality & Pollution ; With having had 3 children already attend Greetland Academy off Saddleworth Road we've already felt first-hand the impacts of heavy commercial traffic that use Saddleworth Road (Quarry above Scammonden Dam, Sonoco Paper Mill, etc) and the environmental impacts these have on the air quality in the area. This is in addition to the already large numbers of stationary traffic on around the traffic light junctions in West Vale. This number of homes with the significant number of cars this would bring would have damaging consequences to the air quality in the area.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1902**

Site ref (if applicable): **LP1625**

Person ID: **1129569**

Name: **Mrs Angeline Nicholson**

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:

Our main objections are due to the following: Flooding ; High Risk We can remember the severe flooding in the area of Ellistones Place and Woodfield Drive, Saddleworth Road, Greetland. We are extremely concerned that this will happen again, which it did on Sunday 9 th February 2020. Any proposed housing development in this area is a significant concern and is classed as a high-risk flood area. I have attached the evidence to support this. The proposed site DOES NOT meet national policy in regards to flooding. Lack of Infrastructure We are very concerned about the impact of any proposed housing development will have on Saddleworth Road and the volume of traffic. Traffic does build up each day in particular at West Vale lights. Traffic comes from the Greetland residents and also Barkisland, Ripponden, Norland, stainland. The volume of traffic is already at its peak taking us 10-15mins at peak times to get out of west vale to travel to work. Any proposed housing development would have a significant effect with the increase of the number or cars on the road in Greetland (e.g. 600 houses, most people nowadays have up to two cars per household). This is a grave concern for us and not only having a massive impact on air pollution and air quality in this area. Having young children this is a massive worry for us. We don't want more pollution ; if anything we want less pollution. We also concerned about the impact the development would have on Greetland Academy ; which is currently at full capacity. Residents ideally want their children to go to their local school ; its going to make less places available and this will have an impact whereby parents will have to drive further to different schools, hence again more air pollution. The local GP Surgery will not be able to sustain its service with an increased number of residents coming into the area. There is also currently a

national shortage of GPs and Nurses across the country. The GP Surgery would have to review whether they could register the large volume of new patients to the area. The proposed development would also impact the local Dentist and whether they could accommodate new patients. Wildlife Corridor The proposed site will have a massive impact on the wildlife in the local area. There are sited owls, squirrels, bats, foxes, insects and birds in this area. This would go against your Environmental Plan in terms of protecting Green Belt and allowing wildlife to flourish and continue. Greenbelt Land According to Paragraph 80 of the NPPF 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 proposed development would contravene against the 5 Green Belt functions. This is very concerning and should be brought to your attention. Of the 17 Sustainability Assessments this allocation has 11 uncertain assessments and 4 negative assessments. This site was refused planning permission also in July 2019. We completely OBJECT to the proposed development and all the other LP's listed on Calderdale consultation portal such as: LP0177 Ellistones Place, Saddlworth Road LP0026 The Gate Farm, Saddleworth Road LP0952nLand at New Gate Farm Primarily for the same reasons and concerns as outlined in this letter. We would be grateful if you could reply to our concerns and it will interesting to know how many objections have been made recently from the residents of Greetland!

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1909** Site ref (if applicable):

Person ID: **1242976** Name: **Mrs Lesley Pollacco** 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 the proposed plans for all of the above sites based on the following: - Objective 2 - TO IMPROVE SAFETY AND SECURITY FOR PEOPLE AND PROPERTY - This development will not improve this SA as there is no local police station or fire station as these have recently closed down. Increased traffic will increase the risk of RTAs. Property will be negatively effected due to the very high risk of flooding due to building on a Flood Plain. Objective 3 TO CREATE AND RETAIN HEALTHY VIBRANT AND INCLUSIVE COMMUNITIES. Increased traffic and traffic jams along Saddleworth Rd from West Vale up to and past Sunnybank Primary School at peak times (at the start and end of the school day) will have a negative effect

on air quality and a likely increased rise in breathing related illnesses. Both local GP surgery's are oversubscribed. Journey time to the town centre at peak times is already around 30-40 minutes. This development will only increase these times. Local primary and secondary schools are already full and 600 houses could result in an extra 40 pupils per year group, therefore pupils will have to travel outside of the area for their educational needs leading to a divisive community and further impacting on road travel. Objective 4TO ENCOURAGE INCREASED PARTICIPATION IN CULTURAL, LEISURE, AND RECREATION ACTIVITIES. 600 new houses will reduce recreational space, currently residents have green belt to walk, enjoy nature and horse ride. Objective 5TO IMPROVE ACCESSIBILITY TO ESSENTIAL SERVICES, FACILITIES AND EMPLOYMENT - These proposals will have a negative impact on the above, GP surgeries and schools are already oversubscribed (see comments above), there is no local police or fire station and there is a poor local train service 4 miles away to Manchester and Leeds which already has insufficient parking. There is an infrequent bus service to Halifax and Huddersfield which finishes early thereby necessitating car travel and all the negative impact this has on time and air quality. Objective 7TO REDUCE THE RISK OF FLOODING AND RESULTING DETRIMENTAL EFFECTS ON PEOPLE AND PROPERTY - this development will most definitely have the opposite effect, this site is a flood plain and regularly floods. I know from living on Scar Bottom Lane that houses in HX4 0HQ have flooded due to many springs lying under the ground. Objective 8TO REDUCE THE EFFECT OF TRAFFIC ON THE ENVIRONMENT Again 600 houses will each have at least one car (through necessity due to poor public transport) and this can only increase the volume of traffic. Objective 9TO PROTECT AND ENHANCE BIODIVERSITY AND GEODIVERSITY - Reducing green belt can only reduce the natural habitats of wildlife. There are also bats living around the HX4 0HQ postcode area Objective 10TO REDUCE POLLUTION LEVELS AND CO2 EMISSIONS TO TARGET LEVELS. I will reiterate that increased cars will only increase the pollution and Co2 levels, this plan will have the opposite effect of this SA. Objective 11TO PROTECT AND ENHANCE THE NATURAL, SEMI NATURAL AND MAN MADE LANDSCAPE. How can building on Greenbelt enhance the natural landscape - this proposal will have a negative effect on the natural landscape. I have been unable to post these comments on the Calderdale website even though I have registered. When I try to add a comment it says: - The event is not currently available for consultation.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID

HRU1915

Site ref (if applicable):

Person ID: 956078

Name: Mrs Pauline Hill

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:

As a resident of Greetland for the past 69 years I am mortified at the prospect of the proposed drastic changes to the previously agreed Calderdale Local Plan for the following reasons. Green Belt Our Green Belt in Greetland is at the heart of the community and there is not much of it left. If these spaces are taken then they are gone forever. The government attaches great importance to Green Belts and stipulates the Green Belt should only be built on in exceptional circumstances . (Refer to Section 13 of the NPPF .) We have sufficient brownfield sites within Greetland providing they are used to accommodate the needs of our local community and to support our local economy and would ask that all 4 of the sites on the Green Belt be removed. How will the council replace our green spaces? I also object to the planning application 18/01189/FUL as this particular site would meet the needs of our local people subject to revised plans. Flooding Flooding is a major problem all along the Green Belt along side Black Brook. The fields were extensively flooded during the storms 8th/9th February 2020 yet again with flood water spilling over into the gardens and almost into the houses of Woodfield Drive. The water was too deep to even walk in and the river bank was totally cut off. The water was rushing into these fields at a terrible and frightening pace and you could not even see the boundary walls. To think that houses could be build on this land is completely outrageous (LP0177). This land has flooded all my life as my parents used to take us down to look when we were children. Do we not have enough flooding, Calderdale have declared a climate emergency? Flooding is extreme and frequent. Wildlife Any development would decimate this Wildlife corridor. There is an abundance of wildlife, herons, owls, many different species of birds, pheasants, bats, frogs, ducks and many more. This is a very valuable part of our environment. There would be an increase in the air pollution, noise, vibration and of course human presence. This Green Belt with all the nature and wildlife should be protected. We need these green spaces for our health they are well used. The wildlife corridor could not survive a major development and is also a flood plain. Traffic and Air Pollution The traffic on Saddleworth Road is becoming almost unbearable especially at peak times. I have lived on Saddleworth road for 67 years and cannot hardly get out of my driveway onto Saddleworth Road due to the amount of traffic. This is only a B road. There is also an increased amount of parked cars on the roadside which makes it even more difficult to navigate. Traffic also comes down from Barkisland and Ripponden. Should more houses be built there would be an increase of at least 1200 more cars as nearly every household has at least 2 cars if not 3 or 4. With the amount of traffic on this road I no longer feel safe walking to West Vale. Traffic is regularly at a standstill on Saddleworth road as the road cannot cope with the amount of traffic that use it. West Vale is consistently congested. We need the air quality in our area testing. We cannot support a huge rise in concentrated air pollution. We have to think of the health of the children and the wider community. Infrastructure Without major adjustments these plans would result in urban sprawl and would have a drastic impact on traffic, schools, GP and Dental Practices. Is it not the governments priority to improve air quality and retain open green spaces. This being essential for our health and wellbeing? If the houses are built on the brownfield sites then I do not object and accept that there may be a need for more housing. It has to be the right housing in the right places. Please make sure all the brownfield sites have been used before trying to take our Green Belt and Wildlife away from us. Attached are pictures from last weeks flooding. As I am writing this the fields are about to be flooded again.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5631975> ; <http://calderdale->

Comment ID **HRU1923**

Site ref (if applicable):

Person ID: **1246474**

Name: **Margaret Stancliffe**

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:

Greetland Infrastructure is not adequate to cope with anymore traffic the situation now is extreme, it only takes one incident to happen & it creates chaos on our roads,also the amount of extra traffic would be perilous to people's health ,the air pollution would become so much worse than it is already endangering our young children's lives ,local schools are all at road level which makes our children very vulnerable. Green areas are also good for peoples wellbeing both mentally & physically our public footpaths are used regularly by walkers old & young, to take away our green spaces would mean more people getting in their cars to do what they have always been able to do on their doorstep. We do not have enough SCHOOLS, DOCTORS, DENTISTS or JOBS in our local community to cater for the amount of houses that are being proposed. The land that these houses are proposed to be built on are FLOOD PLAINS. People living in the area are having to queue for long periods of time just to get through the traffic lights at Westvale which has been made even worse since the redevelopment of the area,this situation will get considerably worse if any more houses were to be built ANYWHERE else in Greetland, they are already building on the site where the Mill used to be ,which in itself is more than enough. If the proposed plans go ahead it is goodbye not only to our greenbelt but to our wildlife too, barn owls , herons kingfisher,grouse ,pheasants, bats & deer . WE NEED TO. SAVE OUR GREEN BELT. As a resident on Saddleworth Road all these reasons for not building are extremely relevant to ALL OF THE ABOVE MENTIONED SITES .

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1928**

Site ref (if applicable):

Person ID: **1182596**

Name: **Miss Yvette Laithwaite**

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:

In my opinion it is unacceptable to propose the above referenced green belt sites in the Local Plan for housing. The green belt has been passionately protected by the council and the people over many years for good reason, to protect the openness of the landscape, protect wildlife, and farmland grazing and prevent urban sprawl amongst many other things. It is unfair to both present and future generations to destroy this by allowing building on green belt land. The land in question at Greetland is a flood plain in an area of West Yorkshire that is already prone to excessive flooding. It goes without saying, this would be a disastrous place to build people's homes. I'm not sure why the council are predicting such a massive economic growth in the forthcoming years? Will Calderdale's economy grow so much, to justify building 1000 brand new houses every year, as mentioned in the latest local plan information? The area would not be able to sustain this level of house building. It's unfathomable. Calderdale would lose its soul and it's beautiful and magnificent countryside along the way. Brown field sites are available in this area and are suitable for building on. In particular the site of the old West Vale Mill which has recently been demolished. This would seem to be an ideal site to create housing for all, but instead I notice that this site has been removed from the Local Plan and is currently going through the planning process to become an elderly care facility proposed by a large corporation. There is already quite a high level of provision for the elderly in the immediate area.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1948**

Site ref (if applicable): **LP1625**

Person ID: **1243847**

Name: **Mr John GUY**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

We are writing to express our opposition to the above sites as listed on the Calderdale Council planning portal. We have attempted to register our opposition on the planning portal and have not received an 'activation code' which means we are unable to comment on the portal. Calderdale Council have not made all residents in the area aware of the need to submit new objections to the updated plan and that these must be submitted in good time. They have a responsibility to the residents and public in general to be

open and transparent and this has not been the case, nor is the process to object easy or straight forward.

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

Sound Reason:

Ref: Objection to the following Sites: LP0026 LP0177 LP0952 LP1625 To whom it may concern, We therefore expect this letter / email to be classed as official comment on the above 4 sites. The reasons for our opposition are as follows: 1) Disproportionate amount of building in the Greetland area . The revisions to the plan (i.e. the addition of the new sites) proves further unsustainable development with a disproportionate amount of new homes proposed across four sites in Greetland, with 1,041 additional units of the 1,708 on new housing sites within Calderdale (over 60%) proposed in the 'Elland' area. The way in which Greetland has been bundled in with other wards creates a misleading representation of the area. It is a village, not a town, why has it been included in Elland and why have other areas eg Stainland had zero land allocated? Ripponden and Rishworth are not included within Sowerby bridge or combined with a town, and therefore are represented in a fair way, which Greetland is not. Why is Greetland set out in such a way to disguise the how disproportionately the land in the local plan has been allocated? 2) Flood areas This affects the whole area. The proposed developments are situated within the flood plain of the Black Brook and are also subject to surface water flooding from the run-off from the steep hillside of the valley. This has been demonstrated very clearly at the beginning of February 2020 following Storm Ciara & storm Dennis. The Environment Secretary has stated that extreme rainfall events such as this will become more frequent as a consequence of climate change. Therefore, flood plains will become ever more important to -"slow the flow"- and reduce the peak river levels further downstream. To build houses here is inappropriate both at a very local level and further afield. Development here on site LP 0177 will result in additional surface run off, which contributes to additional flooding. The fields currently act as a natural flood defense. If new development is related to causing flooding to existing properties, like the houses on Woodfield Drive, the development does not comply with NPPF policy. We need to question the Council's Sustainability Appraisal process to support the release of the new sites with the site at 'Land adjacent Ellistones Place' (Ref: LP0177). This appears to be a completely unjustified recommendation. The site report states that the assessment of SA7 is 'Negative' and marked 'RED' commenting that "Overall the impact is negative as the site is greenfield and lies within flood zones 2 and 3". Based on this information this site should be excluded, and Calderdale has declared a climate emergency. 3) Sustainable development & Infrastructure: The function of the planning system/process is to facilitate sustainable development that makes a positive contribution to the environment. It is not the role of the Council to release demonstrably unacceptable sites within the Green Belt to meet a housing target. The existing infrastructure is not adequate to support the development on this site or at others identified within the local plan. The chronic congestion already experienced in West Vale cannot be remedied and Calderdale Council have already admitted all they can do is change the traffic light sequence. This junction is already running at over 100% capacity. More bus stops and a train station proposed in Elland will not remedy this congestion as more proposed homes will mean more people commuting. Traffic from wider areas will have to come through West Vale to get to the new flyover proposed to join the A629 Elland by-pass to reach the station. Therefore the proposed 600 houses to be built on Saddleworth Rd will cause huge problems for not only residents of Greetland but also surrounding areas. It has been reported by WSP Parsons Brinkhoff Report on Transport Network that the traffic congestion at the junction of Stainland Rd/Saddleworth Rd would increase by approx 105% and that the junction of Stainland Rd/Rochdale Rd would increase by 100%. As West Vales lies at water level this congestion will increase air pollution to health damaging levels and taking into consideration there is a school only a little way up from the junction in West Vale on Saddleworth Rd, the impact to their health will be catastrophic as the school is very near the road. It must also be taken into consideration that majority of the roads in the ward are very narrow. Scar Bottom Lane and Brian Royd being case in point. Only very small buses can travel on these roads and they are limited as to how many people they can accommodate. Putting more buses on will just increase air pollution and

congestion. There currently is no space at doctor and dental surgeries in the area. Similarly the additional housing proposed will be designed with families in mind, and there is insufficient capacity at local schools. There are extremely limited public transport services in the area. 4) Greenbelt land The greenbelt is highly sensitive, due to the wildlife corridor and the way in which it acts as a natural flood defense. The public right of way runs through this stretch of greenbelt and provides the local community free access for leisure and recreation. Why has this been left in the plan when Stainland, on high ground which does not have flooding issues has been saved from the local plan? The development here in Greetland will have much greater harm due to the flooding. A labyrinth of underground springs already cause small scale developments problems. The Greenbelt is protected land which is designed to prevent urban sprawl and towns merging into one entity. Greetland and Barkisland are villages if building on the Greenbelt takes place, then there will be no distinction between them. There is no valid reason to destroy this Greenbelt land when there are brownfield sites available in the area for development. There are many mature trees on the site that need to be protected, as well as the visual amenity, these trees reduce pollution, stabilise the land reducing erosion caused by surface water at times of heavy rain. This area of greenbelt is home to numerous species of wildlife - deer, dippers, bats and countless species of insects. The wildlife & Countryside Act (as amended)1981, The Conservation (Natural Habitats &c) Regulations 1994 and the Countryside & Rights of Way (CROW) Act 2000 are all being contravened by including this site back into the Local Plan for development. Although the Calderdale Council's Senior Planning Officer recently stated at a Local Plan Meeting that they had saved much Greenbelt, the fact is they have proposed to build on even more Green Belt in Greetland than on the previous agreed Local Plan. Indeed the inclusion of sites in Greetland including site LP0026 is the majority of Greetland's existing Green Belt. Esther McVey, the current Housing Minister's written policy on Green Belt land states -"protecting the Green Belt goes beyond protection against development" and -"Greenfield sites should not be what we turn to, not what we look at first. Every blade of grass must be looked at before it is changed." In conclusion, all other issues which have been flagged and some highlighted by the council itself STILL remain.... Traffic impacts Air pollution Infrastructure Flooding They all just add to the fact that the proposed plan is not sustainable in NPPF terms. When the harm identified is taken into account then the proposed plans do not amount to sustainable terms. We look forward to hearing your response,

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1952**

Site ref (if applicable): **LP1625**

Person ID: **1243377**

Name: **Ms Jennifer Guy**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I am writing to express my opposition to the above sites as listed on the Calderdale Council planning portal.

I have attempted to register my opposition on the planning portal and have waited 5 days for my 'activation code' which has never arrived, even following a complaint email to [consultsandreps@calderdale.gov.uk](mailto:consultsandreps@calderdale.gov.uk). Calderdale Council have not made all residents in the area aware of the need to submit new objections to the updated plan and that these must be submitted in good time. They have a responsibility to the residents and public in general to be open and transparent and this has not been the case, nor is the process to object easy or straight forward.

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

Sound Reason:

Ref: Objection to the following Sites: LP0026 LP0177 LP0952 LP1625 To whom it may concern, I am writing to express my opposition to the above sites as listed on the Calderdale Council planning portal. I have attempted to register my opposition on the planning portal and have waited 5 days for my 'activation code' which has never arrived, even following a complaint email to [consultsandreps@calderdale.gov.uk](mailto:consultsandreps@calderdale.gov.uk). Calderdale Council have not made all residents in the area aware of the need to submit new objections to the updated plan and that these must be submitted in good time. They have a responsibility to the residents and public in general to be open and transparent and this has not been the case, nor is the process to object easy or straight forward. I therefore expect this letter / email to be classed as official comment on the above 4 sites. The reasons for my opposition are as follows: 1) Disproportionate amount of building in the Greetland area . The revisions to the plan (i.e. the addition of the new sites) proves further unsustainable development with a disproportionate amount of new homes proposed across four sites in Greetland with 1,041 additional units of the 1,708 on new housing sites (over 60%) proposed in the Elland area. The way in which Greetland has been bundled in with other wards creates a misleading representation of the area. It is a village, not a town, why has it been included in Elland and why have other areas eg Stainland had zero land allocated? Ripponden and Rishworth are not included within Sowerby bridge or combined with a town, and therefore are represented in a fair way, which Greetland is not. Why is Greetland set out in such a way to disguise the how disproportionately the land in the local plan has been allocated? 2) Flood areas This affects the whole area. The proposed developments are situated within the flood plain of the Black Brook and are also subject to surface water flooding from the run off from the steep hillside of the valley. This has been demonstrated very clearly at the beginning of February 2020 following Storm Ciara & storm Dennis. The Environment Secretary has stated that extreme rainfall events such as this will become more frequent as a consequence of climate change. Therefore flood plains will become ever more important to -"slow the flow"- and reduce the peak river levels further downstream. To build houses here is inappropriate both at a very local level and further afield. Development here on site LP 0177 will result in additional surface run off, which contributes to additional flooding. The fields currently act as a natural flood defense. If new development is related to causing flooding to existing properties, like the houses on Woodfield Drive, the development does not comply with NPPF policy. We need to question the Council's Sustainability Appraisal process to support the release of the new sites with the site at 'Land adjacent Ellistones Place' (Ref: LP0177). This appears to be a completely unjustified recommendation. The site report states that the assessment of SA7 is 'Negative' and marked 'RED' commenting that "Overall the impact is negative as the site is greenfield and lies within flood zones 2 and 3". Based on this information this site should be excluded! Let's not forget Calderdale have declared climate emergency! 3) Sustainable development & Infrastructure: The function of the planning system/process is to facilitate sustainable development that makes a positive contribution to the environment. It is NOT the role of the Council to release demonstrably unacceptable sites within the Green Belt to meet a housing target. The Inspector's letter of 16 July 2019 to the Council notes (Para. 14) that "Local Plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits". This is exactly the case in here in Calderdale. Later, where the Inspector asked the Council to review the option of 'the supply of more suitable and available sites elsewhere', however, the further work on the additional sites considered (incorrectly by the Council)

to be 'suitable and available' are not, in fact, suitable nor available, and in any case it has been revealed that this option is simply not sustainable. Why are local brownfield sites not being used as part of the plan. The existing infrastructure is not adequate to support the development on this site or at others identified within the local plan. The road network is already operating at capacity and frequently backs up at Saddleworth Road and Stainland Road at peak times, additional traffic from the development will only exacerbate this problem further. The queuing traffic will lead to increased levels of pollution, which is of particular concern at the Greetland school site which is situated at a lower level than the road. There currently is no space at doctor and dental surgeries in the area. Similarly the additional housing proposed will be designed with families in mind, and there is insufficient capacity at local schools. There are extremely limited public transport services in the area. 4) Greenbelt land The greenbelt is highly sensitive, due to the wildlife corridor and the way in which it acts as a natural flood defense. The public right of way runs through this stretch of greenbelt and provides the local community free access for leisure and recreation. Why has this been left in the plan when Stainland, on high ground which does not have flooding issues has been saved from the local plan? The development here in Greetland will have much greater harm due to the flooding. A labyrinth of underground springs already cause small scale developments problems. The Greenbelt is protected land which is designed to prevent urban sprawl and towns merging into one entity. Greetland and Barkisland are villages if building on the Greenbelt takes place, then there will be no distinction between them. There is no valid reason to destroy this Greenbelt land when there are brownfield sites available in the area for development. There are many mature trees on the site that need to be protected, as well as the visual amenity, these trees reduce pollution, stabilise the land reducing erosion caused by surface water at times of heavy rain. This area of greenbelt is home to numerous species of wildlife - deer, dippers, bats and countless species of insects. The wildlife & Countryside Act (as amended)1981, The Conservation (Natural Habitats &c) Regulations 1994 and the Countryside & Rights of Way (CROW) Act 2000 are all being contravened by including this site back into the Local Plan for development. Although the Calderdale Council's Senior Planning Officer recently stated at a Local Plan Meeting that they had saved much Greenbelt, the fact is they have proposed to build on even more Green Belt in Greetland than on the previous agreed Local Plan. Indeed the inclusion of sites in Greetland including site LP0026 is the majority of Greetland's existing Green Belt. Esther McVey, the current Housing Minister's written policy on Green Belt land states -"protecting the Green Belt goes beyond protection against development"and -"Greenfield sites should not be what we turn to, not what we look at first. Every blade of grass must be looked at before it is changed."In conclusion, all other issues which have been flagged and some mitigated by the council itself STILL remain.... Traffic impacts Air pollution Infrastructure Flooding They all just add to the fact that the proposed plan is not sustainable in NPPF terms. When the harm identified is taken into account then the proposal do not amount to sustainable terms. I look forward to hearing your response,

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1957**

Site ref (if applicable):

Person ID: **1243854**

Name: **Mr Richard Field**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

We are writing to express our opposition to the above sites as listed on the Calderdale Council planning portal. Calderdale Council have not made all residents in the area aware of the need to submit new objections to the updated plan and that these must be submitted in good time. They have a responsibility to the residents and public in general to be open and transparent and this has not been the case, nor is the process to object easy or straight forward.

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

Sound Reason:

We are writing to express our opposition to the above sites as listed on the Calderdale Council planning portal. Calderdale Council have not made all residents in the area aware of the need to submit new objections to the updated plan and that these must be submitted in good time. They have a responsibility to the residents and public in general to be open and transparent and this has not been the case, nor is the process to object easy or straight forward. We therefore expect this letter / email to be classed as official comment on the above 4 sites. The reasons for our opposition are as follows: 1) Disproportionate amount of building in the Greetland area . The revisions to the plan (i.e. the addition of the new sites) is unsustainable development with a disproportionate amount of new homes proposed across four sites in Greetland, with 1,041 additional units of the 1,708 on new housing sites within Calderdale (over 60%) proposed in the 'Elland' area. The way in which Greetland has been bundled in with other wards creates a misleading representation of the area. It is a village, not a town, why has it been included in Elland and why have other areas eg Stainland had zero land allocated? Ripponden and Rishworth are not included within Sowerby bridge or combined with a town, and therefore are represented in a fair way, which Greetland is not. Why is Greetland set out in such a way? This does not show how disproportionately the land in the local plan has been allocated? 2) Flood areas This affects the whole area. The proposed developments are situated within the flood plain of the Black Brook and are also subject to surface water flooding from the run-off from the steep hillside of the valley. This has been demonstrated very clearly at the beginning of February 2020 following Storm Ciara & storm Dennis. The Environment Secretary has stated that extreme rainfall events such as this will become more frequent as a consequence of climate change. Therefore, flood plains will become ever more important to -"slow the flow" and reduce the peak river levels further downstream. To build houses here is inappropriate both at a very local level and further afield. Development here on site LP 0177 will result in additional surface run off, which contributes to additional flooding. The fields currently act as a natural flood defense. If new development is related to causing flooding to existing properties, like the houses on Woodfield Drive, the development does not comply with NPPF policy. We need to question the Council's Sustainability Appraisal process to support the release of the new sites with the site at 'Land adjacent Ellistones Place' (Ref: LP0177). This appears to be a completely unjustified recommendation. The site report states that the assessment of SA7 is 'Negative' and marked 'RED' commenting that "Overall the impact is negative as the site is greenfield and lies within flood zones 2 and 3". Based on this information this site should be excluded, and Calderdale has declared a climate emergency. 3) Sustainable development & Infrastructure: The function of the planning system/process is to facilitate sustainable development that makes a positive contribution to the environment. It is not the role of the Council to release demonstrably unacceptable sites within the Green Belt to meet a housing target. The existing infrastructure is not adequate to support the development on this site or at others identified within the local plan. The chronic congestion already experienced in West Vale cannot be remedied and Calderdale Council have already admitted all they can do is change the traffic light sequence. This junction is already running at over 100% capacity. More bus stops and a train station proposed in



Elland will not remedy this congestion as more proposed homes will mean more people commuting. Traffic from wider areas will have to come through West Vale to get to the new flyover proposed to join the A629 Elland by-pass to reach the station. Therefore the proposed 600 houses to be built on Saddleworth Rd will cause huge problems for not only residents of Greetland but also surrounding areas. It has been reported by WSP Parsons Brinkhoff Report on Transport Network that the traffic congestion at the junction of Stainland Rd/Saddleworth Rd would increase by approx 105% and that the junction of Stainland Rd/Rochdale Rd would increase by 100%. As West Vales lies at water level this congestion will increase air pollution to health damaging levels and taking into consideration there is a school only a little way up from the junction in West Vale on Saddleworth Rd, the impact to their health will be catastrophic as the school is very near the road. It must also be taken into consideration that majority of the roads in the ward are very narrow. Scar Bottom Lane and Brian Royd being case in point. Only very small buses can travel on these roads and they are limited as to how many people they can accommodate. Putting more buses on will just increase air pollution and congestion. There currently is no space at doctor and dental surgeries in the area. Similarly the additional housing proposed will be designed with families in mind, and there is insufficient capacity at local schools. There are extremely limited public transport services in the area. 4) Greenbelt land The greenbelt is highly sensitive, due to the wildlife corridor and the way in which it acts as a natural flood defense. The public right of way runs through this stretch of greenbelt and provides the local community free access for leisure and recreation. Why has this been left in the plan when Stainland, on high ground which does not have flooding issues has been saved from the local plan? The development here in Greetland will have much greater harm due to the flooding. A labyrinth of underground springs already cause small scale developments problems. The Greenbelt is protected land which is designed to prevent urban sprawl and towns merging into one entity. Greetland and Barkisland are villages if building on the Greenbelt takes place, then there will be no distinction between them. There is no valid reason to destroy this Greenbelt land when there are brownfield sites available in the area for development. There are many mature trees on the site that need to be protected, as well as the visual amenity, these trees reduce pollution, stabilise the land reducing erosion caused by surface water at times of heavy rain. This area of greenbelt is home to numerous species of wildlife - deer, dippers, bats and countless species of insects. The wildlife & Countryside Act (as amended)1981, The Conservation (Natural Habitats &c) Regulations 1994 and the Countryside & Rights of Way (CROW) Act 2000 are all being contravened by including this site back into the Local Plan for development. Although the Calderdale Council's Senior Planning Officer recently stated at a Local Plan Meeting that they had saved much Greenbelt, the fact is they have proposed to build on even more Green Belt in Greetland than on the previous agreed Local Plan. Indeed the inclusion of sites in Greetland including site LP0026 is the majority of Greetland's existing Green Belt. Esther McVey, the current Housing Minister's written policy on Green Belt land states -“protecting the Green Belt goes beyond protection against development”and -“Greenfield sites should not be what we turn to, not what we look at first. Every blade of grass must be looked at before it is changed.”In conclusion, all other issues which have been flagged and some highlighted by the council itself STILL remain.... Traffic impacts Air pollution Infrastructure Flooding They all just add to the fact that the proposed plan is not sustainable in NPPF terms. When the harm identified is taken into account then the proposed plans do not amount to sustainable terms. We look forward to hearing your response,

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1964**

Site ref (if applicable): **LP1625**

Person ID: **1246510**

Name: **Daniel Barker**

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 a lifelong resident of Greetland, I believe the construction of ANY buildings in the proposed areas listed above, would be wrong for many reasons. Firstly. This area is a flood plain and surely in the current climate we should not be even considering, putting lives at risk with the potential for more flooding. Also would the tenants be insurable? Secondly. As a natural area for wildlife including heron, bats, fish, birds of many types and an abundance of insects, surely this would have a negative effect on them. Thirdly. As the road infrastructure in lower greetland (west vale) is already in an appalling state, the prospect of adding another 1000 cars (give or take) to that daily commute route is unthinkable. I could go on with this email Eg. This is an important area for people's well-being as it's is a contributing factor to the views across the valley. And popular with walkers. The schools would not be able to cope. Etc. Etc. I hope the planning committee will see the upset this could cause locally and find a more suitable, safer, and more thoughtful position for their future plans.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU2003**

Site ref (if applicable): **LP1625**

Person ID: **1246546**

Name: **J Taylor**

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, I would like to object strongly against the development on the following grounds:- The great increase in traffic flow along Saddleworth Road with the consequent traffic at the West Vale traffic lights and the increased air pollution in the vicinity of the Greetland Academy School. As a retired professional biologist I am aware of the benefits to the local community and the above school, of the preservation of the wildlife along the Black Brook corridor. The increased pressure on local amenities such as school places and local doctor surgery availability would be total unviable. As a local resident in the adjacent area, living alongside Saddleworth Road for the past forty years, I am well aware of the seasonal flooding in the area of the proposed development. Evidence of serious flooding and the consequences, e.g the Calder Valley, indicate the dire result of possible flooding. I trust my objections to the proposed housing development will be viewed seriously and would welcome the opportunity to air my views personally with representatives supporting the development.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2008**

Site ref (if applicable): **LP1625**

Person ID: **955699**

Name: **Mr David Whitworth**

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:

Such a development, on Green Belt, also on a Flood Plane, is against all planning principles. The building of 600 houses, with the additional traffic congestion, the lack of schools, GP,s and Dental Practices,and the ability to cope with the additional population, is wrong. Greetland has seen the development of at least four estates on Saddleworth Road since the early sixties, current climate changes have made it more imperative that no futher development takes place.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU2048**

Site ref (if applicable):

Person ID: **1242592**

Name: **Miss Chelsey Locke**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

No. The proposal does not comply with the NPPF.

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

Sound Reason:

The plan is not sound due to the reasons documented below: Greenbelt and wildlife ; This area is green belt, which is supposedly protected land. The NPPF states that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified and when all possible brownfield sites have been used or considered. There are brownfield sites within the area which must be considered first. There is no exceptional reason to build on this area and remove the green belt status. According to the NPPF, the fundamental aim of Green Belt policy is to prevent urban sprawl; however the building of 600+ houses would have a negative impact on this, vastly increasing the size of Greetland which is currently a semi-rural area and spreading the village closer to neighbouring villages. This is a wildlife corridor, of which many protected species of both animals and birds reside. Building on this land would destroy the natural habitat of these protected animals. The mature trees on this land help to reduce pollution and flood risks. The current trees must be protected and additional trees should be planted here to tackle future flooding, which is inevitable. Flooding ; This area is a natural flood plain. Rain water flows down the hillside towards black brook. If this area was to be built on there would be nowhere for this water to run and soak away, resulting in the excessive accumulation of water closer to black brook. This would cause a catastrophic effect to neighbouring housing as flood water moves more rapidly towards West Vale, Elland and beyond. These areas have already suffered devastating effects of flooding, with these flood plains currently in place. Notably, the floods of Boxing Day 2015 and more recently the floods caused by Storm Ciara in February 2020. It would be incredibly irresponsible of the council to take these natural flood plains away. The NPPF, paragraph 95, states: Planning policies and decisions should promote public safety and take into account wider security and defence requirements by: a) anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area. The removal of flood plains due the proposed development would increase the risk of public safety in the area; as we have witnessed in neighbouring villages recently. Clearly this is against NPPF policy. Infrastructure ; The current infrastructure is not sufficient. An addition of 600+ houses to the area would only cause further problems. The traffic running from the village into West Vale is chaotic, this could not take an estimated 1,200 further vehicles. There is no possibility of widening roads or adding further routes towards west vale and beyond.

Again, it would be irresponsible of the council to allow the increase of approximately 1200 more cars, on roads which are already congested. Saddleworth Road, of which this land lies parallel to, is the same road as which the Sunnybank Preschool and The Greetland Academy is located. An increase in traffic would greater the safety risk to children and parents attending the school. Local services, in particularly the schools are at full capacity from the current residents of Greetland. There is no mention of a further school being built for the additional children 600 houses would bring. If a further school was not going to be built, where are these children going to go? Are current resident going to be forced to send their children to schools in different areas? I know of current residents that travel to doctor surgeries in outside villages. Calderdale Council should concentrate on improving the current infrastructure instead of attempting to worsen the issue. Pollution ; The above addition of traffic would cause a substantial increase in pollution within Greetland, especially when cars are stationary in traffic with their engines on. The construction industry contributes highly to air pollution, due to operating diesel engines, working with toxic materials and dust created from the use of concrete, cement, etc. This site is incredibly close to Sunnybank Preschool and The Greetland Academy. If the development was to be permitted the children of these schools would be subject to a higher risk of developing respiratory illnesses. As stated by the World Health Organisation 'One reason why children are particularly vulnerable to the effects of air pollution is that they breathe more rapidly than adults and so absorb more pollutants. They also live closer to the ground, where some pollutants reach peak concentrations ; at a time when their brains and bodies are still developing.' It is unacceptable to put the children of Greetland at risk of serious illness.

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

Duty to Co-operate Reason:

No. I personally received no information from the council regarding these potential developments and found out only through word of mouth. I believe Calderdale council have acted irresponsibly towards the residents of Greetland, in an attempt to put the local plan forward unnoticed.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2051**

Site ref (if applicable): **LP1625**

Person ID: **1246115**

Name: **Joanna Illingworth**

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 am extremely disappointed to hear that you are wanting to build on our greenbelt land. This will affect our wildlife and is totally unacceptable. There are many bats, badgers, heron and birds of prey living on this greenbelt land. I also use this land to run and walk during summer months (when it is not flooded/boggy)

to support my mental health. Air based pollution will also have seriously adverse effects on our wildlife. The increased traffic will bring with it a considerable increase in air pollution. The Clean Air Strategy 2018 states that while we do need to ensure economic growth we also need to realise the cost of air pollution on health. The single biggest air polluter is traffic/road vehicles. More people die of air pollution than Malaria and HIV. Our children are particularly vulnerable to the effects of air pollution as they breathe more rapidly and are closer to the ground. There is a school and nursery, right on the roadside of Saddleworth Road which all these additional houses would need to pass to leave the village. Not only will all the additional houses effect air pollution they will cause additional problems with traffic, roads, sewers, public transport, schools (already oversubscribed), doctors and dentists. What steps have you made to ensure that the impact of these factors is less harmful?

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2054**

Site ref (if applicable): **LP1625**

Person ID: **1246715** Name: **Liz 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:

Flooding As you will be aware by all the comments and evidence submitted already, this land floods. This land has flooded a number of times, just within the last month. I note that the Council has suggested 'Mitigations' against this flooding. Please bear in mind that when this land floods it PROTECTS LAND AND BUILDINGS FURTHER DOWNSTREAM. When land like this floods, it takes millions of gallons of water out of the watercourse, this then flows back into the watercourse at a later time. Any methods employed to protect houses built on this land are likely to move the problem further downstream. Do we really want more flooding in our area? Green Belt The National Planning Policy Framework (NPPF 134a) 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 their permanence. The proposed development is on Green Belt land. The Calderdale Green Belt Review in 2017 assessed the above sites and found them to be 'Most sensitive' parcels of land. The Greenbelt land which are covered by the above developments are: GB339-00 -“Parcel performs well when assessed against five Green Belt purposes. Greenfield land with agricultural use and watercourse. Parcel adjacent to settlement of Greetland.”GB065-00 -“Parcel performs well when assessed against five Green Belt purposes. Greenfield land that is predominantly agricultural with some woodland. Parcel adjacent to settlement of Greetland.

High potential for unrestricted sprawl-“ I read with interest that Calderdale Council has been granted funding from the Government to 'Crack down on illegal building in Green Belt'  
<https://www.gov.uk/government/news/cash-boost-to-crackdown-on-illegal-building-on-nation-s-green-belt> I wonder if this extends to cracking down on councils allowing building on Green Belt... Infrastructure The local infrastructure is already strained. To allow building of this many houses, in such a small area, would take it to breaking point. I wish that I had time to further expand on my points, but as the deadline is drawing to a close I feel that I must submit what I have!

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

Duty to Co-operate Reason:

Suggested Modifications:

I think that the Council should re-examine it's economic forecast. If the forecast was reduced to a more reasonable level, then this level of house building would not be required. Any new housing should be built on existing brown-field land, or in small pockets so as not to lead to mass-urban sprawl.

Comments:

Additional Evidence Link:

Comment ID **HRU2061**

Site ref (if applicable): **LP1625**

Person ID: **1246735**

Name: **Mark Mullany**

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 impact of the 4 Greetland housing sites on local infrastructure especially the road network, health services and schools will be huge. The road network which would serve these sites already suffers from severe congestion problems bringing economic, social/health and environmental impacts for everyone in the area. At the same time the Saddleworth Road corridor is particularly poorly served by public transport and any initiatives to improve services will be thwarted by intensified congestion resulting from development. Sites adjoining Black Brook are known to be subject to flood risk but the real extent of this risk is highly uncertain due to rapidly advancing climate change impacts which are also adding greater risk from smaller watercourses (also present on some of these sites) and general surface water run off. The sites as a whole provide valuable wildlife habitat in the Black Brook corridor extending into the fields beyond the wildlife network defined on the proposals map. At the same time they provide a valuable recreational resource for local people. However, there are concerns that what small areas of habitat are left after development will be under too much pressure both from construction and intensified recreational use.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU2070**

Site ref (if applicable): **LP1625**

Person ID: **1246744**

Name: **Mr Steven Reed**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I do not believe that plans to build on site LP1625 are legally compliant for the following reasons With reference to: National Planning Policy Framework: 2019, paragraphs 133, 134, 155 - 165, 181 Government White Paper 'Fixing Our Broken Housing Market' WSP Parsons Brinckerhoff Report Calderdale's Vision 2024 Strategy Site LP1625 should be removed from the Local Plan for the following reasons: The inclusion of site LP125 suggests that the plan has not been properly prepared and is not in-line with national policy, and can therefore not be justified. 'Exceptional circumstances' to change the classification site LP1625, making it eligible for development do not exist. Any perceived exceptional circumstances for this amendment to the classification of the sites have not been satisfied. There is no evidence to suggest that thorough assessment, investigation or consultation to suitable brownfield sites has taken place. 'Lack of developer interest' has not been listed as valid reason that warrants the exclusion of a brownfield site from the Local Plan. Re-entering site LP1625 into the Local Plan without final scrutiny from Calderdale Councillors representing the Greetland and Stainland ward, and without pre-consultation engagement is not transparent. I therefore suggest that the consultation that has been set in motion a way that lacks both clarity and honesty. I also believe that labelling site LP1625 as being part of Elland is also very misleading, given that Elland is a completely separate conurbation with has separate identifiable amenities and postcode, and elected representatives. This demonstrates that the plan has not been positively prepared. Lack of adherence to national policy and legislation on flooding makes the plan unjustifiable, given that the development does not pass the 'exception test' (NPPF: 2019); the development is not only at risk of flooding, but without further assessment cannot be ruled out from putting other communities at risk of flooding in the future. No evidence exists to show to show that site LP1625 will not be needed to form part of future flood prevention or alleviation works. This demonstrates that the plan is not sustainable.

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

Sound Reason:

I do not believe the plan to be sound, and reference: National Planning Policy Framework: 2019, paragraphs 133, 134, 155 - 165, 181 Government White Paper 'Fixing Our Broken Housing Market' WSP Parsons Brinckerhoff Report Calderdale's Vision 2024 Strategy Site LP1625 should be removed from the Local Plan for the following reasons: The inclusion of this site inclusion demonstrates that the plan has not been accurately prepared, cannot be justified, and is not consistent with national policy. I make these statements with reference to the National Planning Policy Framework: 2019: 'Exceptional circumstances'



for development on LP1625 Local Plan have not been satisfied. Full examination of other sites has not been evidenced. The possibility of building on Brownfield sites, or increasing the density of other existing sites has not been thoroughly examined. Evidence of any thorough investigation of altering the greenbelt's boundary is lacking. Development of site LP1625 would create urban sprawl, and the reduction of open space that this would lead to contravenes the established purpose of the greenbelt. For these reasons the plan is not sustainable. There is an existing need to reduce the chronic congestion in West Vale, and this proposed development would neither reduce traffic nor alleviate existing issues it raises. No evidence exists as to how the increase in traffic through West Vale's already very busy junctions would be managed, so the existing situation would be worsened rather than improved by the development. The mooted creation of a new train station in the neighboring town of Elland would not reduce congestion in this area, but rather put more strain on the current road network due to increased traffic through the area, given that people would drive to the station and park their cars there, given that there are no other train stations in Calderdale's lower valley other than Brighouse, which is over three miles away. For these reasons the development is not sustainable. Declaration and the need to respond proactively to the Climate Emergency declared by Calderdale Council must override the need to develop site LP1625, due to the importance of the needs for clean air management and the creation of clean air zones. Increased emissions from the cars of people who will reside in the development proposed for this greenbelt site does not support the clear air management strategy. This further demonstrates that the plan is not sustainable. Classification of site LP1625 making it a Class 1 Flood Risk should be reviewed. There is no evidence to show that site LP1625 will not be needed in future flood prevention or alleviation schemes. The impact of climate change cannot be accurately assessed until thorough analysis on the impact of the February 2020 floods has taken place. No evidence has been presented to prove that the site can be safeguarded from flooding in the future nor that the development will not increase the risk of flooding in other communities along the River Calder. Without review of Calderdale's Flood Management Strategy, Calderdale Council cannot state that the plan is sustainable. Lower flood risk sites are available in neighbouring areas, and these, including brownfield sites unaffected by recent flooding, should be examined and considered for development ahead of site LP1625. There is no evidence to demonstrate that this investigation has taken place. Justification Financial forecasting used to determine the number of houses is not sound and should be revised. It has not been positively prepared, is not justified, and is not consistent with national policy: the additional number of houses added into the plan between October 2019 and January 2020 were added to due feedback from the inspector, it was not Calderdale Council's original desire to build so many houses, meaning the figure has been created to fit a target rather than to cater to an actual need. The financial forecast should now be reviewed in light of unplanned expenditure resulting from the February 2020 flood recovery project, and in turn reduce the number of houses required. Moreover, the economic forecast could not reliably forecast the impact of leaving the European Union as the date of leaving had not been determined when the forecast was made. The reasons cited above are a demonstration of why LP1625 in the Local Plan is not sustainable nor justifiable for development. The plan cannot be deemed as sound when sustainability is a key factor in the National Planning Policy Framework, 2019.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2078**

Site ref (if applicable): **LP1625**

Person ID: **1246735**

Name: **Mark Mullany**

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 Parish Council recognises the importance of having a Local Plan adopted to meet the future needs of communities including housing and employment in a sustainable way. To this end it is understood that it is necessary for the Local Plan to be found 'sound' in terms of national planning guidance at its examination in public by the Planning Inspector. However, while the proposals do not impact directly on the Stainland Parish, the extent of Green Belt loss proposed for new housing at 4 sites in Greetland and Elland is considered excessive and unsustainable both in terms of loss of natural environment and landscape character and also in terms of the vastly increased burden it would place on local infrastructure, including the road network, local health services and schools. The road network which would serve these sites already suffers from long standing congestion problems with its attendant economic, social and environmental impacts for everyone in the area including people in the Stainland Parish needing to travel via West Vale to Halifax, or other locations. The Saddleworth Road area of Greetland where the 4 large additional housing sites are proposed is poorly served by public transport and while more housing could in theory increase viability of services, these will continue to be unattractive if congestion problems are exacerbated by large scale development. The Parish Council understands that the levels of employment growth projected by CMBC need to be matched by appropriate levels of housing provision. However, it is noted that CMBC has recognized the many uncertainties associated with long term economic projections and as a result has factored in a reduced level of provision over the last five years of the plan (910 per annum for last five years compared to 1,040 per annum for first ten years). The Parish Council would advocate this approach be extended further, such that further reductions in the housing figure could be made to reflect uncertainty beyond the first five year period at which point a review of the Plan will be due.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2080**

Site ref (if applicable): **LP1625**

Person ID: **1243337**

Name: **Mrs Nicola Reed**

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 legally compliant for site LP1625? No - I do not believe the plan to be legally compliant for the following reasons: With reference to "1. National Planning Policy Framework: 2019, paragraphs 133, 134, 155 - 165, 181 Government White Paper - "Fixing Our Broken Housing Market" WSP Parsons Brinckerhoff Report Calderdale's Vision 2024 Strategy ... I cite the following reasons as to why site LP1625 should be removed from the Local Plan. It's inclusion demonstrates that the plan has not been positively prepared, cannot be justified, and is not consistent with national policy. - "Exceptional circumstances" to change the classification of LP1625, making it eligible for development to not exist, the circumstances have not been satisfied. There is no evidence to suggest that thorough scoping, investigation or consultation to identify brownfield sites has taken place. - "Lack of developer interest" is not listed as valid reason exclusion of a brownfield site from the Local Plan. Consultation has been lacking in clarity and honesty. Re-entering site LP1625 into the Local Plan without final scrutiny from Ward Councillors and without pre-consultation engagement is not transparent. Labelling site LP1625 as being part of Elland is misleading (Elland has separate identifiable amenities and postcode). This demonstrates that the plan has not been positively prepared. Lack of adherence to current policy and legislation on flooding makes the plan unjustifiable as the development does not pass the - "exception test" NPPF: 2019); the development is not only at risk of flooding itself, but without further assessment cannot be rules out from putting other communities at risk of future flooding. There is no evidence to show that site LP1625 will not be needed to form part of future flood prevention or alleviation works. This demonstrates that the plan is not sustainable.

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

Sound Reason:

Do you consider the plan to be sound? - No - I do not believe the plan to be sound. With reference to "1. National Planning Policy Framework: 2019, paragraphs 133, 134, 155 - 165, 181 Government White Paper - "Fixing Our Broken Housing Market" WSP Parsons Brinckerhoff Report Calderdale's Vision 2024 Strategy ... I cite the following reasons as to why site LP1625 should be removed from the Local Plan. It's inclusion demonstrates that the plan has not been positively prepared, cannot be justified, and is not consistent with national policy. I make these statements with reference to the National Planning Policy Framework: 2019: "Exceptional circumstances" for development on LP1625 Local Plan have not been satisfied. Full examination of other sites has not been evidenced. Brownfield sites or increasing the density of other sites has not been thoroughly examined, evidence of any thorough investigation is lacking. Justification of changing the greenbelt boundary is lacking. Development of site LP1625 would create "urban sprawl". Reducing open space contravenes the purpose of greenbelt. For these reasons the plan is not sustainable. There is an existing need to reduce the chronic congestion in West Vale. The development would not reduced traffic nor alleviate existing issues. There is no evidence to demonstrate how the increase in traffic through the West Vale junctions would be managed. The existing situation would be worsened rather than improved by the development. The creation Elland train station would not reduce congestion in this area, rather put more strain on the current road network due to increased traffic through the area. For these reasons the development is not sustainable. Declaration and the need to respond proactively to the Climate Emergency (as declared by the Council) overrides the need to develop site LP1625 due to the importance of the needs for clean air management and the creation of clean air zones. Increased emissions resulting from the cars which reside in the development does not support the clear air management strategy. This further demonstrates that the plan is not sustainable. Classification of site LP1625 making it a Class 1 Flood Risk should be reviewed. There is no evidence to show that site LP1625 will not be needed in

future flood prevention or alleviation schemes. The impact of climate change cannot be accurately assessed until thorough analysis on the impact of the February 2020 floods has taken place. There is no evidence to show that the site can be safeguarded from flooding in the future nor that the development will not increase the risk of flooding in other communities along the River Calder. Without review of Calderdale's Flood Management Strategy the Council cannot state that the plan is sustainable. Lower flood risk sites are available in Neighbouring areas, these should be examined and considered for development ahead of site LP1625. There is no evidence to demonstrate that this investigation has taken place. Financial forecasting used to determine the number of houses is not sound and should be revised. It has not been positively prepared, is not justified, and is not consistent with national policy: The additional number of houses added into the plan between October 2019 and January 2020 were added to due feedback from the inspector, it was not Calderdale Council's original desire to build so many houses, meaning the figure has been created to fit a target rather than an actual need. The financial forecast now be reviewed in-light of unplanned expenditure resulting from the February 2020 flood recovery project, and in turn reduce the number of houses required. The economic forecast could not reliably assess the impact of leaving the European Union as the date of leaving had not been determined when the forecast was made. The reasons cited above are a demonstration of why LP1625 in the Local Plan is not sustainable nor justifiable for development. The plan cannot be deemed as sound when sustainability is a key factor in the National Planning Policy Framework, 2019.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2092**

Site ref (if applicable): **LP1625**

Person ID: **1129718**

Name: **Mr Malcolm James**

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 wish to object to the proposed revised version of the Local Plan and these comments relate to the sites LP0952, LP1625, LP0177 and LP0026. I understand these have been added by the Council to meet a need presented by the inspector. In simple terms the economic objectives proposed by the Council were not supported by enough new housing in the area to support the increased population, which in part is thought would be attracted by the increased work opportunities. Thus it is a case of amending the economic profile or adding housing to meet an envisaged demand. The core of my objection to these additional sites is based on the numbers used in developing the original concept. There was a projection of

a nett employment increase in the area of 8,295 jobs. The period concerned covers 2016 to 2032. Several elements of this figure seem to me to hold no logic at all. I will give several examples from the chart provided for the evaluation of the economic development. An estimated increase of 898 jobs in the combined retail and wholesale. Calderdale is not a location where large distribution facilities will be built. The geography and roads do not attract this activity which is evident by the almost total absence now of these companies. Retail in the towns of Calderdale are not likely to see any growth, holding the present job total would be considered a success. Health, not including care of the elderly, and residential care homes, shows an increase of 902 jobs. I am not certain of the present figure but I do know that about 4 years ago the local Hospital Trust were confident that they could reduce their non-medical staffing total by a rather similar figure based on new technology and greater efficiency of the analytical procedures of testing processes. This was never proved to be the case and thus the additional employment in this area is suspect particularly that the work was split between Calderdale and Huddersfield. Public services shows an expected increase of 3183 jobs. This I am sure will cover the range of such work as prevails in the public sector now. I find it difficult to believe that such a dramatic increase will occur in these years rather improbable. We have spent years reducing the staff and again increasing to this degree seems improbable. This is not a creditable figure for increased employment. I fear that in reality that if the land is given over to housing development the majority of the owners of the new properties will not be people employed in Calderdale but people working in particularly Leeds, Bradford or Manchester. The proximity of the M62 and the prospect of improved train services will be a great attraction for easy development opportunities, not only for those employed in Calderdale. Other considerations relate to the local environment; there is in addition no realistic possibility of improving the traffic flow or pollution on any of the immediate road networks. The roads are bounded on all sides by existing development and there is no point in spending millions on compulsory purchase to widen a road for a short distance merely to move the traffic jam a few hundred meters in either direction. I have chosen not to add to the comments about the green environmental damage or the flooding but fully support those who have. Development in this area would be a bad choice for reasons that hold no logic at all, other than meeting a numerical target, and I would request the proposal are rejected.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2098**

Site ref (if applicable): **LP1625**

Person ID: **960330**

Name: **Christopher & Brenda 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:

Please, please, please can we save 'Our Greenbelt'. At this moment in time 'Greetland's Greenbelt'. We have lived in Greetland for 38 years, in the same house. A neighbour 38 years ago told us there were a lot of underwater streams in Greetland. Autumn/Winter 2019 saw gardens in our avenue flooded for the first time! We have had visits from the sewerage people, Calderdale Council and Yorkshire Water. Consequently four weeks ago two of our neighbours had their gardens dug up. Hopefully Calderdale Council will reimburse our neighbours to restore their gardens to pre-flooding condition. As it is more than likely that this flooding is a result of five houses being allowed to be built on Moorbottom Road! We like walking around Greetland's countryside and have noticed in the last two or three years how two wells have dried up. There was a spring down it's namesake Spring Lane, sadly it is no longer there. The stone trough exists but no water runs into it. Also the spring down Scar Bottom Lane has also dried up. Where is the water going? It has to go somewhere!!! I hope the Council will be held accountable for their decisions if the loss of this greenbelt goes ahead. The consequences of the loss of this greenbelt are ; more flooding, more traffic congestion, air pollution will rise. There will be a rise in noise and light pollution all leading to a rise in mental health issues which in turn all contribute towards 'climate catastrophe'!!!! There will be an increase in the demand on our local GP Surgery, the Dentists and Greetland's Primary School. The present infrastructure cannot cope with another 600 houses. Possibly another 600 children wanting to attend Greetland Primary School. I accept there is a need for more housing but before we dig up our beautiful countryside, our green fields which lie in the greenbelt, let's build on our brownfield sites, convert empty buildings into apartments and houses. Let's ensure all empty houses are occupied. I know of one detached family house in the Elland area which has been empty for years. Bought presumably as an investment! The houses proposed will not be for low income families, first time buyers or older people who want to downsize and which will free up family homes already in the Greetland area. They will be four and five bedroomed detached houses to accommodate people working in Leeds, Manchester.....to maximise profits for the developers. Building on greenfield sites is easier for the developers and again maximises profits! But once these green field sites are bulldozed then there is no going back. The 600 houses will produce an extra 1,200 cars. There will be more air and noise pollution. There could potentially be 600 extra lawn mowers going in the summer months. The loss and damage to our wildlife, which is irreplaceable, their habitats gone forever. Light pollution. Dark skies are becoming fewer and further between. There is so much history connected to our skies. We need to conserve what we have. Building on our greenbelt will exacerbate 'mental health' issues. Open green spaces give people a sense of well being, happiness, contentment. Space to be able to 'stand and stare' and breathe in the natural air free from too much pollution. I quote a passage from the National Trust Magazine: 'We all want quiet. We all want beauty.... We all need space. Unless we have it, we cannot teach that sense of quiet in which whispers of better things come to us gently.' Octavia Hill 1883 Co-founder of the National Trust. She had a desire to protect the everyday beauty of places for everyone to enjoy, forever. We have such a place down Saddleworth Road and Brian Royd Lane. Not everyone can join the National Trust nor wish to get in their car and drive miles to walk in the open countryside. We have such a place on our doorstep. Where people can take fresh air with family and friends. Encourage children to be out in the open, exercising instead of inside and contributing to the obesity problem. Calderdale Council have the same opportunity, to stop our greenbelt fields being bulldozed, concrete foundations laid and six hundred houses built! Surely keeping our greenbelt is in line with the council's 'Wellbeing Strategy'. If the council are concerned about people enjoying good mental health, as Mr Butcher Calderdale's Director of Public Health says, I quote: ' A healthy and happy workplace is more than just an ideal ; it brings with it economic gains for businesses large and small too.' That's the message from Calderdale's Director of Public Health, Paul Butcher in his department's latest annual report. At a special presentation in which the importance of good mental health is discussed..... Good mental health is not just for the workplace but it is also very important in our homes and gardens and the area in which we live. Another 600 houses down Saddleworth Road will not help the

mental wellbeing of the present residents but will exacerbate the problem! Mr Butcher also says 'If the local economy is to grow and flourish improvements to health and wellbeing must be prioritised! How true! Will Calderdale Councillors please consider their 'Wellbeing Strategy' for the people of Greetland. Because the proposed development of 600 houses along Saddleworth Road is not going to help our wellbeing. If it gets approved the development could take four or five years. There will be noise from the diggers as they excavate the beautiful green fields. Noise from the bulldozers, the wagons as they come and go from the site. The workforce - usually have radio's blaring music out. The dust, mud on the roads, more temporary traffic lights. The upheaval to all the wildlife that exists in the area. The loss of the wildlife habitats. We have the usual birds plus herons, grouse, owls, foxes and bats.. How does this help our mental wellbeing? We will need to join a business that is 'celebrating mental wellbeing' and trying to encourage more of it'. I worked for Calderdale Council for thirty years as a teacher. I would now like to retain my mental health wellbeing, by enjoying our greenbelt in Greetland and all that it offers. To continue to enjoy walking in our green countryside without hearing diggers, wagons, drilling, banging sawing, radios, seeing house after house being constructed to the number of 600. I would like to continue to hear the bird song. We heard an owl again last week! If the Leader of Calderdale Council, Councillor Tim Swift is 'committed to protecting Calderdale's green belt and wider countryside' will he please demonstrate it by taking off the greenbelt areas from the Local Plan. Let's build on brown field sites. Actions speak louder than words! We are trying to reduce our local carbon emissions. Councillor Tim Swift says I quote 'The Local Plan gives us the opportunity to manage this development to reduce the environmental impact and to protect the green spaces which are so vital for our communities and for future generations'. How true these words are! The Climate Change Working Party would like to update the Climate Change chapter of the Local Plan to include a commitment within Calderdale to reduce greenhouse gasses by 60% to 2032. How can this happen when there is a proposed development of 600 houses on Saddleworth Road? Is Greetland School going to be surrounded by 600 houses, which could equate to 1,200 extra cars going onto Saddleworth Road to access West Vale. All the fumes that this will add to the area. How healthy will that be for those parents who have chosen to walk their children to school? Rather than take the car and add to the already congested road! How healthy will it be for the many dog walkers, all the existing residents who already know the health benefits of walking and exercise in the fresh air is paramount to a healthy mental wellbeing and how important it is for fitness. Greetland residents don't need to be encouraged to go out and 'move more'. 'Calderdale gets £2.65m boost to encourage more people to be active. Councillor Faisal Shoukat says: .... It's just about encouraging people to move more, more often, whether that's walking the dog, taking the kids to school.....' We already do it and that is why we care so much about our greenbelt we don't want it decimating! Although there again if our greenbelt does go we might need to get in our car and access other open spaces for our daily walk! Adding to the congestion and pollution of our local area! Councillor Faisal Shoukat says 'the Pathfinder grant cash will be used to test ways in which physical activity can be embedded across the borough.....using the borough's parks and open spaces.....' How ironic! We already have the green open spaces on our doorstep which we and visitors currently enjoy. Are we not doing enough destruction to our countryside? Please, Stop and Think! Because once those green fields have gone, they have gone!! There is no going back. Do we really want to destroy the beauty of the green fields, the wild life that inhabits the area. To discourage the walkers who are gaining fresh air, exercise and alleviating any mental health issues? Do we really want to spoil our countryside for the next generation? The children who are at Greetland school. The children who are not yet born and who will attend the school. Josh Fenton-Glynn in his 2019 manifesto prior to the General Election said 'he wanted to preserve the green belt for his 18 month old daughter to enjoy'. Well please Councillors Tim Swift, Faisal Shoukat and Josh Fenton-Glynn, 'actions speak louder than words'. We don't want empty promises. At the moment Councillors and Health Chief's are all very good at saying the right thing but please put it into action and let's stop the decimation of our greenbelt sites in Greetland and also the wider community of Calderdale. I am sure if we look hard enough we can find brownfield sites which are ripe for development, like the desolate site up Blackley which has now been developed and enhanced the area. But please let us not use greenbelt land. We are told the 'Environment Agency have not listened to the concerns raised by the

people living in Mytholmroyd. Well will Calderdale Councillors please listen to the people of Calderdale. We do not want houses built on greenbelt land. Our fields in Greetland are flooded, you will have seen photographic evidence. The Black Brook is a torrent of water. Water runs down hill, it has to go somewhere, where will the water soak away if houses are built on these fields? The water will continue flowing into West Vale and onto Elland and create even more floods. Are Calderdale Council going to pay the insurance for all these flooded properties? Josh Fenton-Glynn says 'It's key to help those worst affected by these floods both financially and mentally, which is why we also have Healthy Minds on standby to help the public.' Well I and many others think that Calderdale Councillors can help the mental wellbeing of the people living in Greetland by saying NO to building on our GREENBELT LAND. We don't want empty promises and words, we would like our Councillors to say NO development on Greetland's greenbelt. Please lets' save it for the next generation. When formulating the first Local Plan I was informed that compromises had to be made. Consequently permission was given to develop greenbelt land down Brian Royd Lane so as to save developing the fields down Saddleworth Road. Please let's not lose those too. Or perhaps we could refrain from building on the greenbelt fields down Brian Royd Lane. Finally in summary my concerns and objections to building on Greetland's Greenbelt are: Traffic Congestion Air Pollution Noise Pollution Light Pollution Flooding Mental Health Issues Loss of Wildlife and their Habitats Thank you for reading my objection. Brenda Smith

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2112**

Site ref (if applicable):

Person ID: **1246858**      Name: **Edwina O'Sullivan**      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 COMMENT WAS RECEIVED AFTER THE CLOSURE OF THE REPRESENTATION PERIOD. There would be a terrible impact on the roads through Greetland into West Vale which are already very busy and gridlocked at peak times not to mention the danger to school children. It would also cause a big impact on Schools, Doctors and Dentists in this area. All these sites are prone to bad flooding and are not suitable to build houses on.

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



Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU2123**

Site ref (if applicable):

Person ID: **955848**

Name: **Mr Chris Illingworth**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Compliance / Lack of Transparency Calderdale council have failed to make Greetland residents aware of these plans, timescales, and the need to submit objections following recent changes and re introduction of land. The whole process lacks transparency and seems underhand. The fact the section along one stretch of road has been split into 4 areas, the complexity of the submission page and where to find the plots given they have classed under a different village name (Elland) which Greetland has never been linked to. Also from the start there was a lot of talk that this is a done deal from people who knew people who worked at the council and local farmers who's land will be sold. When objections have been submitted they have been changed or vastly delays going on the system so no one can read them. My 72 year old mother in law cried the other day after trying to object at how complex the whole system is and how her and her friend at the church and other high numbers of elderly on the area felt they were letting the community down with how complex and unsupported the process is. Also I am sending this by email as the number of times I have tried to do on the system for it to shut down with a number of error messages (one being -"the event is not currently available for consultation!??) I will try and add to each site in the official way but giving the pending deadline if I cant get it to work I wanted to send something across.

Do you consider the plan to be Sound?:

Sound Reason:

Infrastructure Traffic - There's a significant issue with congestion along Saddleworth Road as it stands, particularly around West Vale junction where it often takes over 20 minutes just to get through 1 set of lights. Building any additional homes that will use this junction will just compound this existing issue. But building up to 600 homes along one road without significant infrastructure improvements will be detrimental to the area. It was also increase the number of cars heading up to and from the M62 motorway, already an extremely busy route with long wait times at peak times, putting people off moving to the area. The road is also used for many heavy vehicles such as large lorries and tractors (I would say 1 in 7 vehicles is a HGV) this is only going to get worse with planning permission for a HGV turning circle being agreed to send large vehicles away from Sowerby bridge and down Saddleworth road into Greetland. In an area which is high for families, has a school on the main road and is already heavy congested how can the council think adding any more traffic (never mind 600 houses worth) on one road is a logical decision School ; Greetland (Sunnybank) is at full occupancy with some years over subscribed. Expansion of the school would be needed to support any additional homes or will existing and new residents be expected to

move out of the area? There are no available plans on how this issue will be mitigated. It is also on the main road which given the traffic issues raised above gives major concern for air pollution for our children ; how will this be mitigated? Doctors ; Again, an element of our infrastructure that is already at breaking point, with significant wait times for appointments. Additional homes will further strain this and increase the traffic around the west vale junctions. Safety The amount of traffic moving along Saddleworth Road at peak times currently presents a significant risk. This is particularly apparent at school pick up and drop off times. Just before Christmas my father had an accident whilst dropping both our Children off for school. The sheer amount of traffic and the narrowing of lanes (due to parked cars and HGV's) results in someone reversing into his car and causing a serious head injury. Luckily the children weren't in the car at the time. More housing will cause more injuries and safety concerns. Land allocation It's difficult to understand from the information provided why Greetland has been categorised in with other local areas , I.e Elland and Stainland, which when added together presents a misleading position of the area and the impact of so many additional homes. In addition, the only reason established (or communicated) for not focusing developments across a broader area of Brownfield sites is due to the additional costs to developers. This, in anyone's eyes, cannot be deemed 'exceptional circumstances' and the council clearly had not explored all other available options for development. Given the scale of the Calderdale area putting the majority of their housing plan across 2 close villages on green belt land says more about the politics between the different councillors representing different parties than it does about their planning capability Wildlife We used to live in Leeds but moved to Greetland so our children could grow up in the countryside alongside wildlife. We often go for family walks along the wildlife corridor and see a vast number of animals such as deer, hedgehogs, beavers, owls, Herron and I have been told of a number of bats in the area. I just cant get my head around what exceptional circumstances with a vast number of derelict brown field sites unsupported would allow the vast development proposed along this precious wildlife corridor on green belt land ; not withstanding the years of disruption and noise the building at this scale would pose to the wildlife and the children at the local school. I would seriously question the mitigating risk of this in the plans and the extent to which the real level of wildlife in the area has been captured Flooding Development along Saddleworth Road will result in surface run off, impacting the entire area. Greetland already suffers from flooding across this proposed site. These fields act as a natural flood defence and housing development will surely increase the problem and create more flooding in the West Vale area. It is not small scale as recently demonstrated when the water ran down and flooded a number of properties and commercial outlets in west vale. The water was so strong a shipping container was removed from a west vale rugby club causing damage to a bridge in Ellend. With the current government commitments and the complex nature of the springs leading down the fields in Greetland how can turning these vast fields into concrete support and prevent the flooding which is regularly seen. The small area of land marked as flood plane already regularly goes into residents gardens, many roads all the way along from saddlewprth road are often more like streams with Gate house land and other areas being prone to flooding. The NPPF states no development is to be permitted on land that is liable to flood. With millions of tax payers money being spent on flood defences in the area which still don't prevent flooding how can any of this land be classed as not liable to flood (lots of photographic evidence over the years and this year of this across all 4 proposed sites) How can the prime minister commit to stop building in areas of high probability of flooding when the majority of Calderdale housing plan is in an area which regularly floods? The mitigation comments on the plans show a real lack of understanding and wider impact of the area Summary Building up to 600 new homes in one village, along one road, increasing the village capacity of urban sprawl (1041 additional units overall in a village less than 3000 dwellings!) with no clear plan to mitigate the above issues defies any logic or common sense. The lack of thought, consideration and transparency of process provides no confidence the plans will implemented with any degree of success. Therefore, as a family we strongly oppose any plans to build on all sites given the lack of infrastructure and impact on pollution and wildlife in the area, the disregard for history and heritage and the disriportunate impact of the houses being build on one main road in one village. I would also be very keen to understand the exceptional circumstances to justify building on greenbelt to this extent in one village with a number of brown belt

sites left in derelict in this and other wards? There are currently 135 properties for sale on right move in HX4 alone with a number of friends having to rent their houses as unable to sell Despite the lack of infrastruce, impact on wellbeing and quality of life of children, safety of the road and air pollution I cant see how this plan is sound or legal and it does not conform to central govemement policy or current legislation with regards to building on flood risk areas. It also does not conform to any commitments the govemement has made on tackling air pollution and flooding in the area

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2129**

Site ref (if applicable):

Person ID: **1246861**

Name: **Ms Jemma Guy**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

I am writing to express my opposition to the above sites as listed on the Calderdale Council planning portal. I have attempted to register my opposition on the planning portal and have not received my 'activation code' which means I am unable to comment on the portal. Calderdale Council have not made all residents in the area aware of the need to submit new objections to the updated plan and that these must be submitted in good time. They have a responsibility to the residents and public in general to be open and transparent and this has not been the case, nor is the process to object easy or straight forward.

Do you consider the plan to be Sound?:

Sound Reason:

1) Disproportionate amount of building in the Greetland area . The revisions to the plan (i.e. the addition of the new sites) proves further unsustainable development with a disproportionate amount of new homes proposed across four sites in Greetland with 1,041 additional units of the 1,708 on new housing sites (over 60%) proposed in the Elland area. The way in which Greetland has been bundled in with other wards creates a misleading representation of the area. It is a village, not a town, why has it been included in Elland and why have other areas eg Stainland had zero land allocated? Ripponden and Rishworth are not included within Sowerby bridge or combined with a town, and therefore are represented in a fair way, which Greetland is not. Why is Greetland set out in such a way to disguise the how disproportionately the land in the local plan has been allocated? 2) Flood areas This affects the whole area. The proposed developments are situated within the flood plain of the Black Brook and are also subject to surface water flooding from the run off from the steep hillside of the valley. This has been demonstrated very clearly at the beginning of February 2020 following Storm Ciara & storm Dennis. The Environment Secretary has stated that extreme rainfall events such as this will becomemore frequent as a consequence of climate

change. Therefore flood plains will become ever more important to -“slow the flow” and reduce the peak river levels further downstream. To build houses here is inappropriate both at a very local level and further afield. Development here on site LP 0177 will result in additional surface run off, which contributes to additional flooding. The fields currently act as a natural flood defense. If new development is related to causing flooding to existing properties, like the houses on Woodfield Drive, the development does not comply with NPPF policy. We need to question the Council's Sustainability Appraisal process to support the release of the new sites with the site at 'Land adjacent Ellistones Place' (Ref: LP0177). This appears to be a completely unjustified recommendation. The site report states that the assessment of SA7 is 'Negative' and marked 'RED' commenting that "Overall the impact is negative as the site is greenfield and lies within flood zones 2 and 3". Based on this information this site should be excluded, and Calderdale has declared a climate emergency.

3) Sustainable development & Infrastructure: The function of the planning system/process is to facilitate sustainable development that makes a positive contribution to the environment. It is not the role of the Council to release demonstrably unacceptable sites within the Green Belt to meet a housing target. The existing infrastructure is not adequate to support the development on this site or at others identified within the local plan. The road network is already operating at capacity and frequently backs up at Saddleworth Road and Stainland Road at peak times, additional traffic from the development will only exacerbate this problem further. The queuing traffic will lead to increased levels of pollution, which is of particular concern at the Greetland school site which is situated at a lower level than the road. There currently is no space at doctor and dental surgeries in the area. Similarly the additional housing proposed will be designed with families in mind, and there is insufficient capacity at local schools. There are extremely limited public transport services in the area.

4) Greenbelt land The greenbelt is highly sensitive, due to the wildlife corridor and the way in which it acts as a natural flood defense. The public right of way runs through this stretch of greenbelt and provides the local community free access for leisure and recreation. Why has this been left in the plan when Stainland, on high ground which does not have flooding issues has been saved from the local plan? The development here in Greetland will have much greater harm due to the flooding. A labyrinth of underground springs already cause small scale developments problems. The Greenbelt is protected land which is designed to prevent urban sprawl and towns merging into one entity. Greetland and Barkisland are villages if building on the Greenbelt takes place, then there will be no distinction between them. There is no valid reason to destroy this Greenbelt land when there are brownfield sites available in the area for development. There are many mature trees on the site that need to be protected, as well as the visual amenity, these trees reduce pollution, stabilise the land reducing erosion caused by surface water at times of heavy rain. This area of greenbelt is home to numerous species of wildlife - deer, dippers, bats and countless species of insects. The wildlife & Countryside Act (as amended) 1981, The Conservation (Natural Habitats &c) Regulations 1994 and the Countryside & Rights of Way (CROW) Act 2000 are all being contravened by including this site back into the Local Plan for development. Although the Calderdale Council's Senior Planning Officer recently stated at a Local Plan Meeting that they had saved much Greenbelt, the fact is they have proposed to build on even more Green Belt in Greetland than on the previous agreed Local Plan. Indeed the inclusion of sites in Greetland including site LP0026 is the majority of Greetland's existing Green Belt. Esther McVey, the current Housing Minister's written policy on Green Belt land states -“protecting the Green Belt goes beyond protection against development” and -“Greenfield sites should not be what we turn to, not what we look at first. Every blade of grass must be looked at before it is changed.” In conclusion, all other issues which have been flagged and some highlighted by the council itself STILL remain.... Traffic impacts Air pollution Infrastructure Flooding They all just add to the fact that the proposed plan is not sustainable in NPPF terms. When the harm identified is taken into account then the proposed plans do not amount to sustainable terms.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU2137**

Site ref (if applicable):

Person ID: **1246864**

Name: **Mr Andy Lomas**

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:

Comments:

Additional Evidence Link:

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Comment ID **HRU2141**

Site ref (if applicable):

Person ID: **1246865**

Name: **Mr Daniel Jevons**

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 in reference to site numbers LP0026, LP0177, LP0952, and LP1625. I believe that these proposed developments are unsuitable due to the impact on the local infrastructure, which has not been sufficiently considered within the local plan. The development would have a significant impact on traffic, increasing journey times to the town centre and adding to already large queues of traffic in the local area at rush hour. There would also be an increase in air pollution as a result of the increase in road users,

whilst at the same time depriving the local population of open green spaces. Local services would also be impacted by the development such as schools, dental practices, and medical centres. The existing services would be unable to cope with such a large influx of people. Finally, the recent weather events that have taken place so far this year and the flooding that has occurred within the proposed development areas in Greetland as a result is a concern. Given that this land essentially acts as a flood plain currently, any proposed development is at risk of flooding, or diverting flood water and impacting other residents.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2144**

Site ref (if applicable):

Person ID: **1243036**      Name: **Dr Fiona Ellam**      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 is no evidence on any published documents made available to the local residents indicating the impact that this development will have on the surrounding area in terms of: air pollution, traffic increase, impact on local amenities, the environmental impact in terms of water course and potential flooding as the land is no longer able to soak up water. The area is designated as Elland (not our postcode) not as Greetland and West Vale, the amenities in Elland are not relevant to this area, they are different. There is no traffic management plan in evidence for this area, to accommodate the increase volume of traffic, it is an already congested area. There has been a lack of transparency by the council with the additional of this site to an amended version of the Local Plan . There is a lack of transparency and honesty in labelling adjacent sites as individual entities. They all would increase the amount of urban sprawl and have a cumulative impact. There has been a lack of communication with the community by the council which is against Calderdale's statement of community involvement (2015) The development of a greenbelt area is only to be undertaken in exceptional circumstances as the current housing minister indicated. There has been no explanation as to why this is exceptional circumstances to develop this area. There is no detailed information on the environmental impact of using this greenbelt land, in terms of the mental wellbeing on the community who are currently able to access Black Brook for walking etc.

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

Duty to Co-operate Reason:

Suggested Modifications:

There needs to be more detailed impact studies completed, for example: What are the current levels of air quality and how would these be changed by the increasing volume of traffic, what impact would building on this site have on water levels of the brook? This data needs to be shared with the local community in a transparent way.

Comments:

Additional Evidence Link:

Comment ID

**HRU2149**

Site ref (if applicable):

Person ID: **1246866**

Name: **Ms Karen Lomas**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The Calderdale Statement of Community Involvement 2015 calls for clear communication and clarity. The consultation process has not been clear. Labelling sites along Saddleworth Road, with an HX4 postcode, as 'Elland' which has a different postcode and is a town in its own rights with separate amenities, is misleading. This is a crucial factor in my decision to consider the Plan NOT legally compliant. There has been a lack of community consultation regarding the inclusion of site LP0026, re-entering site LP0029 back into the Local Plan without scrutiny from ward councillors demonstrated a lack of honesty and transparency. Pre consultation engagement regarding site LP0026 has not taken place. The NPPF, para 155 to 165, states that building in flood risk areas should only be in exceptional circumstances and IT SHOULD NOT be to the detriment of other communities. There is not sound research to show that areas below the development would not suffer from flooding as a result of its introduction. This is not legally compliant.

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

Sound Reason:

Calderdale economic forecast is not reliable. Calderdale Clean Air Policy ; states there is a climate emergency - and NPPF para 181 - building and traffic congestion would cause further pollution and will contribute to the climate emergency.

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

Duty to Co-operate Reason:

NPPF para 133 advises against urban sprawl which will happen with this development NPPF para 102 ; chronic congestion ; this will happen in West Vale NPPF para 138 ; why take from one area and recreate in another

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU2153**

Site ref (if applicable):

Person ID: **1246867**

Name: **Ms Louisa Fisher**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

I feel Calderdale Council has failed in its duty to inform residents of these plans and therefore given them little time to object.

Do you consider the plan to be Sound?:

Sound Reason:

Greenbelt NPPF paragraph 143 states: -“inappropriate development is harmful to Greenbelt and should not be approved except in very special circumstances” I have seen no evidence from Calderdale Council to justify -“special circumstances” This area is a significant area for wildlife ; bats, owls, badgers, foxes, herons, etc. If we lose this area of Greenbelt land we lose the wildlife forever. Open green spaces are important for the physical and mental well being for all. Flooding As a resident of Saddleworth Road, I am well aware of the flooding which occurred in December 2015 and again in February 2020 and the devastation it caused local residents and businesses in the area. There are numerous natural springs in the hillside from Stainland, Barkisland and Greetland which run through this land. Should the land be developed where will this water go? It will move further down the valley causing flooding to other areas. The land is a natural flood plain and as such it should be left to do its job. Congestion The junction of Saddleworth Road/Stainland Road and Rochdale Road/Stainland Road is already significantly congested. Increasing housing will just exacerbate the ongoing problems with traffic congestion and pollution. Infrastructure Local schools are already full to capacity. The local GP surgery would not cope with the extra patients. Urban Sprawl There is a risk that urban sprawl will further encroach into the surrounding countryside. This land in Greetland falls within the wider area of Elland and there is a disproportionate allocation to Greetland than other parts of the Elland region. Stainland having no housing allocation at all.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU2158**

Site ref (if applicable):



Person ID: **1243962**

Name: **Mrs Anne Crawford**

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:

Air Quality- This is of great concern as we live adjacent to Saddleworth Road. We already think that the air quality is poor you can smell the fumes when we sit in our garden from all the lorries and cars that use this road. When we walk to the park in West Vale with our young grandson the fumes can be terrible and this isn't at peak times. When the motorway is closed the traffic backs up as far as Ellistones Place , this will only get worse. Recent articles by experts at children's hospitals have concluded that infants exposed to traffic flow have less grey matter in their brains and are more likely to develop asthma. More houses, means more cars which means more pollution especially to vulnerable children at schools on roadside sites in Greetland and West Vale. Building the quantity of homes proposed for Greetland will massively increase traffic, this isn't just the homeowners cars but delivery vehicles. It is the local government's duty to protect young and old alike from anything that may deliberately damage their health. The government is committed to reducing road pollution so this massive development should not go ahead. Noise Pollution- We already experience levels of noise pollution from the many lorries that speed down Saddleworth Road. We have speeding cars and taxis during the early hours of the morning especially Friday and Saturday nights and we are usually woken at 6am in the morning by traffic. If all these houses are built the traffic noise will be unbearable. This does not help our well being but causes depression. Loss of Wildlife- We are really concerned about the huge impact of this mass housing will have on local wildlife. The plan to build on so many fields at once is irresponsible, wildlife doesn't stand a chance. The local plan will destroy so many habitats this also has an impact on human welfare and the benefits of nature. Behind our house there used to be a small wilderness ( it was green belt), the area was full of wildlife - bats, squirrels, foxes, mice, moles and many species of birds. Their whole habitat was destroyed for the sake of two big houses now concreted over. The impact on wildlife coming to our garden has been huge we hardly see anything now. Flooding - It hasn't stopped raining since September (climate change). Greetland is situated on a hillside and is full of springs. When it rains water is coming out of the ground everywhere, down ginnels, pouring out of people's driveways, coming through walls etc. In December 2015 Greetland was awash with water in particular the fields in LP0177 and again a couple of weeks ago when the proposed building site was a lake. In both these incidences West Vale was flooded damaging property. If this building work is allowed to take place then instead of the fields soaking up the water, the water will rush down the hills into West Vale flooding West Vale but it won't stop there this will lead to increased flooding in Elland and Brighouse. In light of the desperate situation in Hebden Bridge and Mythomroyd and the plea by flooded households and businesses to try to prevent this from reoccurring it seems irresponsible to create that situation deliberately in this area. It was reported on the news this week that West Yorkshire has had the highest rainfall this winter than anywhere else in the U.K. Overdevelopment in one area - Greetland is being overdeveloped in comparison to other areas. We are expected to accept development on a life changing scale for people living in this area when other areas of Calderdale aren't seeing any development at all. The sites should be spread across Calderdale. In the past Greetland has seen many developments especially on Saddleworth Road. We don't have enough school places now nether mind when all these family homes are built, doctors and dentists are full. West Vale is a nightmare now, we have lived here 19 years and I don't remember having 1 year when Stainland Road didn't have roadworks. Loss of Greenbelt- what's the point in having areas designated as Greenbelt when it seems so easy to take it out. The idea of Greenbelt is to protect the countryside not to remove it, it should remain Greenbelt forever. In January

2021 the government is introducing a points based system for immigration. The figures for the amount of houses required was based on the free movement of the European Union these figures now need to be revised so therefore there should be a reduction in the amount of houses built. Please listen to the real concerns of people who live in Greetland. At the moment it is a pleasure to see the green fields to the south of Saddleworth Road please keep it that way.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU2179** Site ref (if applicable): **LP1625**

Person ID: **1246900** Name: **Mrs Lorraine McLaren** 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:

Due to technical difficulties with your website we would like to register our objections to the proposed above devopment sites. Greetland is a beautiful semi rural village and the proposed extent of increasing the population density without any forward thinking regarding infrastructure would not be conducive to the the well-being of local families who are already experiencing fast paced change. Increased traffic would impart on the clean air and environment factors we are all aiming to improve for the future. Approval of such developments would also contradict our responsibilities to our local wildlife. Proposed development on any Green belt floodplain beggars belief especially as recent weather conditions now seem to be more of a regular occurrence. Please accept and confirm our objections to the above proposals.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU2180**

Site ref (if applicable): **LP1625**

Person ID: **1246901**

Name: **Mr Stuart McLaren**

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:

Due to technical difficulties with your website we would like to register our objections to the proposed above development sites. Greetland is a beautiful semi rural village and the proposed extent of increasing the population density without any forward thinking regarding infrastructure would not be conducive to the well-being of local families who are already experiencing fast paced change. Increased traffic would impact on the clean air and environment factors we are all aiming to improve for the future. Approval of such developments would also contradict our responsibilities to our local wildlife. Proposed development on any Green belt floodplain beggars belief especially as recent weather conditions now seem to be more of a regular occurrence. Please accept and confirm our objections to the above proposals.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU2202**

Site ref (if applicable):

Person ID: **1130552**

Name: **Mrs Nicola Beaumont**

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:

Flooding You only need to look at the February 2020 floods to understand why building on this land is outrageous. Not for the first time, the river burst its banks along Saddleworth Road with flood water rising in the fields of the proposed development plots. Having previously lived on Saddleworth Road, I know for

certain that this is not a one off. On many occasions, I would sit and watch as the river levels rose, and eventually fields (floodplains) becoming submerged in water. You can also look back at the floods of Boxing Day 2015. A memorable day when not only the river of Saddleworth Rd, but many parts of Calderdale (including Heath Rugby Club/Willow Valley Garden Centre), were unfortunate to be the victims of heavy rain and flooding. If these developments go ahead, where will the water go? The floodplains hold water in such a way that it creates a natural flood defence, storing water before it can take devastating effect elsewhere (people's homes and businesses). The Environmental Agency has as stated that this area of land is categorised as the most severe of all - Flood Zone 3 (land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%). Below are photos taken in the proposed Saddleworth Road sites following the February 2020 floods.

**Green Belt** This land is classified as highly sensitive green belt on the Local Plan. It is a designated wildlife corridor and is home to a number of protected species such as bats, hedgehogs, barn owls, wood peckers, herons and birds of prey. A large scale housing development would result in non-physical disturbances to the wildlife and protected species in our area. Such disturbances are noise, vibration, visual presence, human presence, light pollution and air pollution. Government policy states that all brownfield sites must be used first. Brown field sites have not been exhausted. Air Pollution

Developing 600 new houses along Saddleworth Road, we can estimate that this will bring approximately 2 vehicles per household, which equates to 1200 extra vehicles on the road in the local area. West Vale cannot cope with the vast amount of traffic congestion as it currently stands; increasing this will only have significantly negative effects on traffic levels and the levels of air pollution. Air pollution consequently affecting the health and wellbeing of people especially those in close proximity of the area. For example, the children at The Greetland Academy and Greetland Pre-School. Being located at the side of Saddleworth Road will not only make this a physically unsafe place to be, but the health of these children will be impacted by the inhalation of added traffic fumes. The World Health Organisation stated that one reason why children are particularly vulnerable to the effects of air pollution is that they breathe more rapidly than adults and so absorb more pollutants. They also live closer to the ground, where some pollutants reach peak concentrations; at a time when their brains and bodies are still developing. The Clean Air Strategy 2018 stated that - "While we do need to ensure economic growth, we also need to realise the 'cost of air pollution on health.'"

[https://consult.defra.gov.uk/environmental-quality/clean-air-strategy-consultation/user\\_uploads/clean-air-strategy-2018-consultation.pdf](https://consult.defra.gov.uk/environmental-quality/clean-air-strategy-consultation/user_uploads/clean-air-strategy-2018-consultation.pdf)

**Community** The proposed sites for development are used daily for walking and other forms of recreational activity such as biking and running. This green belt land is open space and a wildlife corridor, homing owls, bats, herons, hedgehogs but to name a few. The land is a quiet place, perfect for mental and physical health and wellbeing. Building on this land will be detrimental to the health and wellbeing of our people.

**Infrastructure** The Greetland Academy already consists of 2 classes per year group, with approximately 30 children in each class. This school is already split over 2 sites, both full to capacity, so how can it possibly cope with accommodating more children? Developing on this land will provide no option to extend the Key Stage 1 Site, and the location of Key Stage 2 makes it impossible to accommodate increased intake of children. The Doctors Surgery would struggle to manage waiting times and appointments with an increase in patients and the local Dentist already have a waiting list for new patients. Junctions at West Vale unable to accommodate additional volume of traffic, as it is already dysfunctional. West Vale is a thoroughfare for a number of locations including but not limited to: Halifax, Huddersfield and the M62. Commuters from various surrounding areas such as Ripponden, Barkisland, Elland and Stainland rely on the West Vale junctions to make journeys to these destinations. The increase in traffic congestion is too much for West Vale and surrounding roads to cope. Also, worth noting is, Rochdale Road which runs parallel to Saddleworth Road is also impacted by traffic congestion from Saddleworth Road, and again is not capable of supporting the increased number of vehicles on the road as a result of the housing developments.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5634811> ; <http://calderdale-consult.objective.co.uk/file/5634810> ; <http://calderdale-consult.objective.co.uk/file/5634812>

Comment ID **HRU2212**

Site ref (if applicable):

Person ID: **1246925**

Name: **Mr George Hill**

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:

Green Belt Our Green Belt in Greetland is at the heart of the community and there is not much of it left. If these spaces are taken then they are gone forever. The government attaches great importance to Green Belts and stipulates the Green Belt should only be built on in exceptional circumstances. (Refer to Section 13 of the NPPF .) We have sufficient brownfield sites within Greetland providing they are used to accommodate the needs of our local community and to support our local economy and would ask that all 4 of the sites on the Green Belt be removed. How will the council replace our green spaces? I also object to the planning application 18/01189/FUL as this particular site would meet the needs of our local people subject to revised plans. Flooding Flooding is a major problem all along the Green Belt along side Black Brook. The fields were extensively flooded during the storms 8th/9th February 2020 yet again with flood water spilling over into the gardens and almost into the houses of Woodfield Drive. The water was too deep to even walk in and the river bank was totally cut off. The water was rushing into these fields at a terrible and frightening pace and you could not even see the boundary walls. To think that houses could be build on this land is completely outrageous (LP0177). Do we not have enough flooding, Calderdale have declared a climate emergency? Flooding is extreme and frequent. Wildlife Any development would decimate this Wildlife corridor. There is an abundance of wildlife, herons, owls, many different species of birds, pheasants, bats, frogs, ducks and many more. This is a very valuable part of our environment. There would be an increase in the air pollution, noise, vibration and of course human presence. This Green Belt with all the nature and wildlife should be protected. We need these green spaces for our health they are well used. The wildlife corridor could not survive a major development and is also a flood plain. Traffic and Air Pollution Should more houses be built there would be an increase of at least 1200 more cars as nearly every household has at least 2 cars if not 3 or 4. With the amount of traffic on this road I no longer feel safe walking to West Vale. Traffic is regularly at a standstill on Saddleworth road as the road cannot cope with the amount of traffic that use it. West Vale is consistently congested. We need the air quality in our area testing. We cannot support a huge rise in concentrated air pollution. We have to think of the health of the children and the wider community. Infrastructure Without major adjustments these plans would result in urban sprawl and would have a drastic impact on traffic, schools, GP and Dental Practices. Is it not the governments priority to improve air quality and retain open green spaces. This being essential for our

health and wellbeing? If the houses are built on the brownfield sites then I do not object and accept that there may be a need for more housing. It has to be the right housing in the right places.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU2248**

Site ref (if applicable):

Person ID: **844301** Name: **Cllr Marilyn Greenwood** Organisation: **Calderdale Borough Council**

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

SEE ATTACHED FOR FULL REPRESENTATION

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

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION

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

Duty to Co-operate Reason:

SEE ATTACHED FOR FULL REPRESENTATION

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5635292> ; <http://calderdale-consult.objective.co.uk/file/5635291>

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Comment ID **HRU2269**

Site ref (if applicable): **LP1625**

Person ID: **1246939** Name: **Joseph Matthews** 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 would like to strongly object to the following sites. Reference ; LP0952 LP0026 LP1625 LP0177 I strongly object to proposed change to the housing requirement made by Calderdale Council due to the sheer lack of existing infrastructure we have to support the additional growth in houses, and in the absence of an adequate and sound infrastructure plan. I have reiterated my comments in previous consultations about the community's concern about our already overstretched infrastructure. It is not just GP surgeries, schools and other frontline services, but the capacity of our highways, train services, our drainage and sewerage systems, and our few remaining floodplains/Greenfields (including Green Belt) in our area. I carry serious concerns due to the sheer volume of proposed new houses, coupled with an inadequate infrastructure plan with no evidence of funding or deliverability, and no guarantee that those moving into these new houses will be those who work in the area. This will result in more traffic on already heavily congested roads, just try driving through West Vale at rush hour, deteriorate air quality , pollution and associated health and wellbeing of residents, see the loss of the majority of our Green Belt, will increase the flood risk , and push our already overburdened public and frontline services past breaking point. Furthermore, the Local Plan goes against the 'Climate Change Emergency' declared by Calderdale Council on 30.01.2019 with regards to air quality, transport and flooding. The recent events of Storm Ciara and Storm Dennis shortly following, illustrated the Calder Valley's vulnerability when it comes to flooding. I have spoken with many local residents from the Greetland area whilst on the campaign trail who have informed me that each and every one of the sites proposed within the local plan had flooded during the recent storms. Disproportionate and overdevelopment of our area, as is recommended in the Local Plan, would decimate our area, leave very little Green Belt/open spaces for residents and wildlife to enjoy, rapidly deteriorate our air quality (increasing mortality rates and risk) and exacerbate flooding in our area.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2280**

Site ref (if applicable): **LP1625**

Person ID: **1246958**

Name: **Mr Ian Barker**

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 COMMENT WAS RECEIVED AFTER THE CLOSURE OF THE REPRESENTATION PERIOD. I would hereby like to register my formal OBJECTION to the planned building on the land adjacent to Saddleworth road Greetland, Application numbers: LP0177 ; LP0026 ; LP0952 ; LP1625 Reasons According to legislation when planning and developing an area, buildings should first and foremost be built on 'Brown Field' sites, and not Green Belt land. I am aware that there are still a number of Brown Field sites that have not been developed in the area. All four sites listed above are currently Green Belt Land. Three of the sites listed currently also form part of the flood plane around the Black Brook river which does actually flood every year now. This Green Belt area forms part of a Wild life corridor where the following can be seen: Herons, King Fishers, Owls and most importantly Bats as well as squirrels and lots of other bird life. Also I have seen first hand what can happen when a building development takes place along side what is a clean river. Building waste pollutants and other rubbish ended up in the river, and actually killed a lot of the fish. This area is also used on a daily basis by people who like to take in nature and enjoy the sound of the river and the bird song etc. One other area of concern is the fact that if planning permission goes ahead for up to 600 houses then on average most households now own 2 cars. This would mean up to 1200 more vehicles could be using Saddleworth road on a daily basis. With most of them having to pass the Junior and infant school which is situated to the south side of the road and has actually been built below the level of the road. This means that when the extra vehicles are queuing for the traffic lights as they pass the school the Children are going to be more vulnerable to the dangerous pollution from vehicle exhausts which does actually stay down closer to the ground at low level. The traffic flow through both sets of traffic lights in west vale is already running at around 100% capacity during the morning and evening commute. With an estimated 1200 more vehicles using this route there is no way that these traffic lights will be able to manage without there being huge tailbacks and grid lock. Finally: I would once again like register my 'Objection' to the above mentioned planning permission being granted.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2298**

Site ref (if applicable):

Person ID: **1140095**

Name: **Malcolm James**

Organisation: **Greetland & Stainland  
Liberal Democrats**

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:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5635657> ; <http://calderdale-consult.objective.co.uk/file/5635658> ; <http://calderdale-consult.objective.co.uk/file/5635659> ; <http://calderdale-consult.objective.co.uk/file/5635660> ; <http://calderdale-consult.o>

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Comment ID **HRU2313**

Site ref (if applicable):

Person ID: **1241485**

Name: **Mr Wilson Simms**

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:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5635675> ; <http://calderdale-consult.objective.co.uk/file/5635674>

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Comment ID **HRU290**

Site ref (if applicable): **LP1625**

Person ID: **1242021**

Name: **Mr Damien Margetson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I am not qualified to answer this question

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

Sound Reason:

I have set out my comments on the following plans LP0026 (The Gate Farm), LP0177 (Land adjacent Ellistones Place), LP0952 (Land at New Gate Farm) and LP1625 (Land to the west of Silverdale Terrace). These observations are based on my personal reflections, having lived in the community for the past 4 years, against the objectives which are set out in National Planning Policy Framework dated February 2019 (-"the Framework")<sup>1</sup>. The comments I have made are relevant to all of the proposed development sites. I don't think it is possible to consider them individually as they are so interrelated, within the same area and all comments I make are relevant to each of the plans. I have attempted to review information contained on the Calderdale planning website but have found this to be confusing, contradictory and too restrictive in the way it requires my objection to be included and to be honest I am unsure of whether it is free from political bias. The Framework states there are 3 overarching objectives: Economic, Social and Environmental and at the heart of this is a presumption in favour of sustainable development. I am not against development of new homes but these have to be sited in areas which can accommodate them and where they are most needed. Taking each of the objectives in turn I have the following comments:

Economic: We have currently entered into the Brexit transition period, with little certainty of exactly what this will mean for our economic prospective going forwards. My understanding is that the current plans that have been put forward are based on estimated growth rates. Given this uncertainty I don't see how the Council can continue with these plans until some of that uncertainty is removed. I would therefore suggest that plans are at least put on hold until we have completed the transition period and we have an understanding of what our new trading relationship is with Europe and how this might change the growth ambitions and assumptions. The Framework suggests that economic objectives are underpinned by - "identifying and coordinating the provision of infrastructure"<sup>2</sup> I can't see how this objective is achieved with the current plans. 600 new homes requires the development and provision of significant changes to the infrastructure in the surrounding area BEFORE the homes are built. There is none in the current plans for this as far as I can determine. Local schools, doctors and dentists are currently oversubscribed and have no capacity to accommodate any more residents. Where will they go? The local bus service already does not meet the demands of the area, with the 503 services to Halifax and Huddersfield often being oversubscribed and delayed due to the existing traffic hold ups. Additionally this service running through West Vale is between 1-2 kilometres away from the majority of the proposed houses on these sites. The 343 service passing along Saddleworth Road is infrequent (only one bus per hour) with bus stops only on one side of the road - a safety risk for not only children and the elderly, but indeed for everybody, especially given the speed at which traffic enters the area and the heavy wagons using the road. The local traffic in West Vale and Greetland is already at a standstill in peak times and this is slowly getting worse at off peak times. There are currently proposed developments for improving the road network on A629 Huddersfield to Halifax corridor and on the A58 / A624 Halifax to Rochdale / M62 routes. This is great news for improving commuting along these routes, but it misses the point that Saddleworth Road is a direct connection between these schemes. Any improvement at the entry and exit to Saddleworth Road is pointless if the access between is congested and doesn't flow, as is the situation now in the bottleneck that is West Vale. The introduction of 600 houses along this route will only further add to this congestion and seriously undermine the economic benefit which is supposed to be generated from these Road Schemes and housing developments. Saddleworth Road itself is already an infrastructure disaster, especially in and around the areas of the proposed new developments. Throughout the whole 2019 there have been roadworks somewhere along this stretch of road. Invariably it is as a result of water rising to the surface,

which I am told by the Individuals doing the repairs is due either to one of the numerous fresh water springs bursting through the surface material or the decay of the old pipework, which is being patched. It is not surprising the local road conditions are so poor (some of the worst I have seen in my travels across the country) given the volume of traffic which currently uses this road, especially from the HGVs which have to use the road to access the Sonoco recycling plant and the Bosch industrial units. Every journey requires me to wait for one of these HGVs to manoeuvre around the parked cars before any progress can be made. God knows what damage construction vehicles and a further 600+ cars will do to the road. The Council seemingly already doesn't have enough budget to repair the existing roads properly and sustainably - the situation is only going to get worse. I have noted that as part of this process Greetland has been classed as part of the Elland Township to justify the proportion of allocated land. I do not see how this can be so. Greetland is a separate village with its own characteristics, community, infrastructure and councillors. I have never considered myself to be living in Elland. We are clearly separated by Long Wall. If Greetland is looked at as a separate locality, which I strongly believe it should, then the local plan allocates a disproportionately high number of new homes in this area as well as creating large scale urban sprawl which is contrary to para 80 of the Framework. Social ; health and fumes / pollution At para 170 the framework states ' Planning policies and decisions should contribute to and enhance the natural and local environment by: " | a) protecting and enhancing valued landscapes, sites of biodiversity or geological value' The Greenbelt areas under discussion sit within the heart of the Greetland community. Taken together, they form a large open space creating a wildlife corridor full of biodeiversity. If this proposed development were allowed to go ahead the landscape and natural habitats for these animals would be lost, causing distress and irreparable destruction. I regularly witness deer bounding through the fields under consideration. Where would these creatures go? It is not a sound argument to suggest that the wildlife corridor could be protected. Once their natural home is taken away, it is gone for good. The framework also states at para 170 e) that policies and decisions should contribute to and enhance the natural and local environment by ' preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution ' and ' Development should" | help to to improve local environmental conditions such as air and water quality' . I do not see how the building of 600 new homes, with the associated emissions from both heating and cars can possibly do anything but have a detrimental affect on the local air pollution. Saddleworth Road, the main road through these developments, is already a primary route for a large number of lorries a day from the Bosch factory, the Sonoco recycling plant. Add to that an additional 600 homes within a small area and the community is exposed to unacceptable levels of traffic and air pollution. Environmental: The framework documents states -“ The Government attaches great importance to Green Belts "¶it goes on to state -“Green Belt boundaries should only be altered where exceptional circumstances are fully evidence and justified"¶ At para 144 it further states -“ local planning authorities should ensure that substantial weight is given to any harm to the green belt"¶and at para 145 - “ a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt "¶I can't see how any of these statements can be met with the building of 600 new homes on an area of sensitive Green Belt. At para 155 the framework states: -“ Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere "¶The areas proposed for the new 600 homes is on Green Belt that naturally floods. In the 4 years I have been a resident of this community the area has been completed flooded twice. With the local area full of fresh water springs it is not uncommon to find the local drains and sewers unable to cope even after shortest of prolonged heavy bursts of rain, and it is only the presence of the Green Belt area which prevents homes flooding on a regular basis. The frequency of these heavy and prolonged rains is only set to increase with the global warming challenges we currently face. It therefore seems incongruous to add to this problem by building on the only area which nature has provided to counter the irreparable climate changes we are facing. In September 2019, The Housing Minister, Rt Hon Esther McVey announced that local authorities would be receiving money to crack down

on illegal developments in Green Belt areas, stating that ' Once the Green Belt is built on its often gone for good, thats why we are determined to protect it. The public have told us loud and clear they want it kept for future generations to enjoy. ' I understand that Calderdale Council is set to receive Â£50,000 of this Planning Delivery Fund. How can it justifiably take this money in one hand to prevent inappropriate building on Green Belt Land, and in the other hand allow the large scale destruction of Green Belt Land in the Greetland area? This is the first time I have ever objected to a proposed development - I am doing so because I feel so strongly that we need to protect this area of natural Greenbelt. 20 years ago we were told that if we didn't make changes then climate change would ruin our planet - as human beings we largely chose to ignore those warnings. We are now starting to reap the consequences with increased temperature extremes, earthquakes, storms and flooding. My children continually tell me that our generation are ruining their future. They have a valid point. We need to stop the continual disregard for our environment, natural habitat and wildlife and instead seek alternatives. There are numerous brownfield sites (as well as lower flood risk areas) that could be considered as development options to create new housing - some of these may be more expensive to develop, but developers profits should not be the overriding consideration in deciding where to build. Neither should political motive. On this basis, all 4 of the sites, LP0026 (The Gate Farm), LP0177 (Land adjacent Ellistones Place), LP0952 (Land at New Gate Farm) and LP1625 should be removed from the Local Plan

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

Duty to Co-operate Reason:

I am not qualified to answer this question

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU313**

Site ref (if applicable): **LP1625**

Person ID: **1242293**      Name: **Mr Andrew Beaumont**      Organisation:

Agent ID:      Name:      Organisation:

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

Legal Compliance Reason:

Please refer to comments below

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

Sound Reason:

For the attention of those responsible for Approving or Rejecting Local Development Proposals (Local Plan Team, Councillors, Local and National Planning Inspectors, Katie Child, Miny Schofield) Dear Sir, Letter of Objection to Proposed Housing Developments in Greetland - Site Ref LP0952. LP0177, LP1625 and LP0026 I have been a resident of Greetland all my life, some 63 years. Over that period I have witnessed the relentless creeping expansion, development and transformation of our once small desirable residential rural village into a fairly large residential conurbation of urban sprawl serving the commuter belts for the

cities of Leeds and Manchester. Already gone, over my lifetime, are many of the green fields and areas where we played as children, in favour of large housing developments. However, these developments are modest in comparison with the proposed Housing Development Plan which some local and national politicians seem determined to drive through, no matter what the cost to our community, environment, air quality and wildlife. If this development comes to pass, the village of Greetland will balloon, in a very short space of time, by 30 - 40%. And, apparently, with no forward thinking about how this expansion can be serviced. The community already seems to be serviced to full capacity by roads, public transport, doctors, dentists and schools. Any future demands on these services would be unsustainable. Anybody living in the area, including the surrounding areas of Elland, Stainland, Norland, Barkisland and Ripponden, understands the nightmare of rush-hours in West Vale. For years, it has been a bottleneck for residents, using both public transport and private cars, as all routes lead to the traffic-light controlled junction of Saddleworth Road and Stainland Road, followed within 200 yards by the next traffic-light controlled junction of Rochdale Road and Stainland Road. At each of these locations there is the added complication of two very busy, relatively new businesses (the Co-op and Springhead Funeral Services) - how, in heavens name, was permission ever granted for their main vehicle access points to be located immediately next to the traffic lights, creating a near certain recipe for both road traffic accidents and/or holding up the traffic? And obviously, as a result of the traffic congestion on Saddleworth Road, some residents of the Sunnybank, Daleside and Trenance Gardens areas, as well as some residents of the new homes, will divert their routes to use Rochdale Road which will simply distribute the congestion to the whole of Greetland. There is currently no way of avoiding West Vale and there is no way of expanding the road network to by-pass West Vale in the future. And then there is the very serious consequence of this massive increase in traffic - air pollution. The development is within a valley which will trap traffic exhaust fumes. Within this valley are two schools, Greetland School Sunnybank Annex and West Vale, where some of the most vulnerable people in our society, young children, will be subjected to high levels of toxic air pollution every day of the week. And what will be the impact of all this air pollution on the Council's health and anti-obesity campaign? The loss of this Green Belt will remove an extremely popular route for many people taking social exercise, not only to improve their physical health but also their mental health well-being. The alternative would be to walk along Saddleworth Road, breathing in the pollution, or driving further away to rural areas for cleaner fresh air. The area along the Black Brook is also a recognised Wildlife Corridor - sightings of bats, owls, herons, kingfishers, badgers and deer are commonplace. If this development gets the green light, the destruction and eradication of the existing flourishing ecosystem is guaranteed. In this age of Climate Change and Global Warming, we are constantly being reminded of the adverse effects on our environment. And the proposed development area is no stranger to regular and serious flooding (in 2015 we experienced some of the worst flooding in living memory). The fields around the Black Brook act as a natural flood plain, without which, more serious flooding of developed areas further downstream would be a certainty. Existing drains and sewers already appear to be working to full capacity so any significant increase in foul and surface water volumes would spell certain disaster at the point of discharge. Surface water attenuation systems can be designed and included within the engineered drainage proposals, but the very old existing infrastructure at the end of the line was not future-proof designed for the volume of water that would be generated by developments of this size. And would a development of this size, combined with all the other concurrent developments throughout Calderdale, necessitate the construction of additional sewage treatment works? We already have "the Smelly Mile" in our locality, Stainland Road from West Vale to the Calder and Hebble; additional sewage treatment will not do anything to improve the air quality here. I have recently read a document taken from the Council's Planning website, entitled "Local Plan Initial Draft 2017" in respect of Site LP0177. Never have I seen a report so heavily slanted in favour of its paymaster, David Wilson Homes, and so obviously commissioned and prepared by a well practiced Specialist Planning Consultant, who probably lives many miles away and will, therefore, be unaffected by the consequences of this development, and who has spent only a couple of days surveying the area and really knows nothing about our community and its way of life, and in order to satisfy the ulterior motives of some members of Calderdale Council to drive this development through

whatever the cost. Some of the statements, comments and responses in each of the Site Assessment Categories are so theoretical and standard that they could have been taken from the manual "How to Get Your Development Through the Planning Hoops" and could have been prepared at a Consultants desk in the Outer Hebrides with the aid of Google Maps and aerial photographs. To prepare a report that truly reflects the conditions and consequences of such a major development, you need to live in the village, you need to use the services and facilities, and you need to know and understand the community, the habitat and the behaviour of the people and the wildlife that is home to all of us. So do I agree with the site assessment? ABSOLUTELY NOT! I have not used the on-line Planning Portal because it isn't easy to navigate and I felt it was easier for me to speak from the heart in a letter. But please ensure my letter of objection is added to the many other similar letters you may receive.

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

Duty to Co-operate Reason:

See previous comments

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU318**

Site ref (if applicable): **LP1625**

Person ID: **1128222**

Name: **Mrs Bennett**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

With specific regard to Community Involvement I do not believe that community involvement is in general accordance with the Calderdale Statement of Community Involvement 2015. Section 1.2 of the Calderdale SCI 2015 calls for Clarity. - "We need to be very clear about what we are asking people and we must be sure that people understand what will happen as a result of this engagement. This includes being clear about what decisions have been made, what have not, and who will make the final decision." Until a recent local meeting on January 27th, and a local action Facebook group was set up, very few people in the Greetland Ward were aware of the Local Plan and proposed new allocations within the area. - It is unclear that site allocations submitted in the 2018 draft plan are still in the Local Plan and hence people do not have a clear picture of all the site allocations included. This makes a significant difference when looking at percentage growth of a community. - many people including myself are not clear on what we are being asked with questions such as 'is the plan legal?' 'Do you consider the plan complies with Duty to Co-operate?'. - With regards to LP26, LP177, LP952 and LP1625: Greetland, Sunnybank and West Vale Wards still remain part of Elland. This is misleading and means some residents would take a look at the initial directory of new site allocations, and failing to see Greetland on there, think that there is no inclusion in their area. I made this error in the 2017 submission process until corrected by a neighbour. - The SCI under section 1.3 states - "to keep the process simple" and - "to make it easy to get involved" Asking questions such as - "is the plan legal" is not simplistic as most people outside of a planning department would not know the answer to this question and would potentially be put off contributing. - I do not think it has been

easy to get involved. Most people, in a room full of over 200 people at a recent local meeting, did not know where to find the local plan or how to go about commenting. This is also evident by the fact that Councillor Paul Bellenger has pushed the Head of Calderdale Planning for an email address, external to the online portal, to try and make it easier for people to comment. The council has provided a Sustainability Appraisal Report. However, under the chosen Option 4, of the 17 objectives analysed, 9 of them have been marked as -“uncertain” impact. I question how fully this report has been used as a 'tool for appraising policies to ensure they reflect social, environmental and economic factors' when the impact to the Greetland community at local site level of so many key outcomes are also uncertain including: accessibility to essential services, facilities and employment; to reduce the risk of flooding; to reduce the effect of traffic on the environment etc.

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

Sound Reason:

Justified - in choosing the sustainable option has the council considered the impact of Brexit on economic growth and resulting housing requirements? has the council ruled out all other sites such as Brownfield and less site sensitive sites? Positively prepared - has the council consulted other neighbouring authorities to see if they can accommodate potential sites as opposed to destroying greenbelt in an area like Greetland that already requires most people to travel to work by car? Effective - placing such a significant number of houses in such a small community is not deliverable and there are no significant infrastructure plans in place to evidence that it is sustainable. Is the plan consistent with national policy? No, my summarised objections to this site allocation are: - disproportionate growth of 33.8% to the Greetland Community which contradicts Greenbelt policy to restrict urban sprawl - No exceptional reasons to remove Greenbelt status - Strains on existing road and junction infrastructure with little planned mitigation for these new proposals - Loss of habitat and wildlife - Unmeasured impact on air pollution for both the area as a whole and the local primary and preschool sites on Saddleworth Road. These objections are substantiated below to relevant policy. Disproportionate increase to the Greetland Community. - LP26, LP177, LP953 and LP1625 are so close in proximity that they should be viewed jointly as well as individually. Calderdale Infrastructure Delivery Plan 2019, Table 3 shows the Distribution of household growth for 2018-33. It incorporates Elland, Greetland, Stainland and Holywell Green into one group. As such, expected percentage change in household growth is 8.21%. - This fails to give the Inspector a clear image of the distinct communities within our wider area. This is an oversight as the NPPF under Achieving Sustainable Development Section 2, point 8 states a -“social objective” to support vibrant and healthy communities. The Cambridge Dictionary defines community as -“the people living in one particular area” Elland is 2.4 miles from Greetland postcode HX4 8PG and as such should be considered as a separate area. (Apple maps). Looking at the ward map for Calderdale, the community of Greetland should be defined by the interlinking of the Greetland and Sunnybank wards, with the possible inclusion of West Vale. This is due the proximity of the housing in these wards and the significant infrastructure and environmental effect that would be concentrated in this space. See link for ward map: [www.calderdale.gov.uk/v2/maps/offices-political](http://www.calderdale.gov.uk/v2/maps/offices-political) Under the Calderdale Review of Polling Districts 2019, the number of properties per polling district is as follows: - Greetland 1221, Sunnybank 505, West Vale 1119. This totals 2,845 properties. - Under additional local site assessment reports LP26, LP177, LP952 and LP1625 are all in immediate vicinity of Greetland and Sunnybank wards. Combined we would see 543 additional new houses built in this distinct community on top of capacity allocated in the 2018 plan. As a percentage of the 3 wards this would see a disproportionate growth of 19% or 22.4% when adding in the 2018 site allocations. - Many locals have further purported that the West Vale Ward is a community in itself (having its own primary school) which would take growth of Greetland and Sunnybank to 31.4% or 33.8% when including 2018 allocations. (<https://www.calderdale.gov.uk/v2/sites/default/files/Returning-Officers-Recommendations.pdf>) Within the Potential Sites considered and rejected report CC37, LP1028, which is also in Greenbelt, had a planned site of 122 dwellings removed. One of the reasons stated is that it would give a "disproportionate increase

to Barkisland village". The increase based on the same dataset above would have been 16.6%. If Barkisland can be pulled out of its grouping with Ripponden and Rishworth then we suggest that Greetland can be distinguished from Elland. If 16.6% is disproportionate to one village why is 22.4% or even 33.8% not disproportionate to another? Perhaps the answer to this is sadly in the other reason why LP1028 has been withdrawn .... lack of interested developer! This shows lack of consistency in application of NPPF policies. Furthermore, The Sustainability Assessment Report for LP26, OBJECTIVE TO CREATE AND RETAIN HEALTHY VIBRANT AND INCLUSIVE COMMUNITIES has been given as 'overall impact is positive as the site is within a 0-15 minute journey of a town centre; is within 600m of Public Open Space; and within a 15 minute journey to a GP surgery'. This fails to take into account that the massive increase in traffic from the combined sites will increase travel time substantially, is reducing open space by building right next to a public footpath where people enjoy the view of open space and the local GP surgery is full and may no longer be within 15 minutes due to the increase in resulting traffic . The Cabinet report on Potential Modifications to the draft Local Plan paragraph 1.4 states that ' a sound Local Plan delivers a sustainable scale and distribution of new homes....whilst protecting and nurturing our environment'. - This scale of distribution (22.4-33.8%), within one village community, is not sustainable given the infrastructure shortfalls of traffic, schooling and other services. - The Sustainability Assessment reports for all 4 LPS for OBJECTIVE 5 TO IMPROVE ACCESSIBILITY TO ESSENTIAL SERVICES, FACILITIES AND EMPLOYMENT have been marked as positive yet they all note the risk of demand on existing services whilst not making plans for mitigation. - This also contradicts the purpose of Greenbelt to restrict urban sprawl (paragraph 134 NPPF) and would also decimate 23.74 hectares of Greenbelt with no exceptional circumstances given (measurements taken from Local Plan Assessment Reports). - This also contradicts the purpose of Greenbelt to -“ assist in safeguarding the countryside from encroachment” All 4 LPs against The Sustainability Assessment of OBJECTIVE 13 TO ENSURE EFFICIENT USE OF LAND have been marked negative as it is all greenbelt. - Whilst we may be 'close' to transport investments (paragraph 1.5 Potential Modifications report) such as the A629 and potential Elland station etc the fact remains that most people will get in a car to get to these links. The only way to do this is via the 2 bottleneck crossroads in West Vale. - Graphs found on city ward explorer shows Greetland and Stainland as already having the highest percentage of cars per household in Calderdale at 84%. Equally it also shows that the average distance travelled to work is 13.2km. - By creating more houses in this area it will only add to congestion and air pollution which will not assist the council in reducing the Green House Emissions noted in paragraph 4.15. Nor does it support the councils wish in paragraph 4.2.1 to reduce car use. Additionally. Paragraph 103 of the NPPF states -“ 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 transport modes. This can help to reduce congestion and emissions, and improve air quality and public health” There are no immediate plans for economic employment growth in Greetland hence no limiting of travel to the additional proposed 543 dwellings. In all likelihood we will see a significant increase in car usage as existing buses that service west Greetland are small and infrequent. The LP is also over 2km from a railway station. NPPF Paragraph 108 states that -“in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: a) appropriate opportunities to promote sustainable transport modes can be ; or have been ; taken up, given the type of development and its location; - The location of the site in an out of town Greenbelt area lends itself to car use - 84% of this population own a car. b) "safe and suitable access to the site can be achieved for all users;" - The Sustainability Report for LP26, Objective 2 to improve safety and security, shows an uncertain outcome hence this has not been ensured. The junction of Scar Bottom Lane and Gate Head Lane which are most directly effected by LP26 and LP952 is not adequately mitigated. In order to accommodate the resulting traffic and proposed roundabout the road would need to be widened, thus removing trees under Tree Preservation Orders. There would also be a knock-on effect of danger to the top entrance of Brian Royd Lane. This lane (as an extension to the lower part of Scar Bottom Lane) has restricted visibility and is already used as a cut-through. This will only get worse. - Equally, no mitigation had been put in place to improve road safety outside Sunnybank Preschool and Greetland Academy which is already frightening at



peak times of day with school traffic, tractors and Sonoco HGVs. - Calderdale are also planning the creation of an A58 Ripponden HGV Turning Circle. This has a significant impact on the Greetland area as it will encourage HGVs onto Saddleworth Road. I picture a mini roundabout at the bottom of LP26 with HGVs coming from the west, SONOCO trucks from the east, the local bus from the north .... oh and hundreds of new residents and the usual tractors! This is not safe or suitable access! - NPPF Paragraph 111 states - "All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed" - I ask the council to define 'significant amounts of movement' and ask do the sites combined represent significant amounts of movement and has a travel plan for these combined developments been or needs to be generated? Major development is defined as: - "For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more" - I suggest that the combined LPs area of 23.7 hectares will lead to significant movement. In order to be 'sound' and in accordance with the NPPF the plan should be positively prepared 'on a strategy which seeks to meet objectively assessed development and infrastructure requirements'. - With reference to the Calderdale Infrastructure Delivery Plan, Table 5: Congested Locations and Associated Funding Opportunities, the location of Stainland Road/Saddleworth road is considered and notes "upgraded signal improvement and localised traffic management needed". - This will be woefully inadequate for potentially 1000 extra cars as evidenced by the outburst of laughter at a community meeting when suggested that signalling upgrades enough would be sufficient. In fact WSP Parsons Brinckerhoff Report on Transport Network states traffic congestion at the juncture of Stainland Road-Saddleworth Road would increase by approximately 105%. The junction is already maxed out. - The infrastructure plan also highlights investment needed in West Vale and buses given priority. However, many of the bus stops in Greetland are unsafe, based on opposite sides of the road and are on routes which are too narrow so a complete overhaul of the bus infrastructure would be needed to accommodate this many people. - I do not feel that an adequate infrastructure plan is in place for this level of growth in one village community. The lack of infrastructure also contradicts paragraph 72 of the NPPF: NPPF 72. "The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:" - Calderdale does not have the support of the Greetland Community, only that of a couple of individual landowners and private developers. 33.8% is a 'significant extension' and we have not seen a thorough investigation of infrastructure requirements at a level local to Greetland. "a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains; " - With the destruction of 23.74 hectares of Greenbelt there will be no environmental gains, only significant losses to wildlife. The areas covered by LP26, LP177, LP952 and LP1625 represent a wildlife corridor home to deer, badgers, bats, owls, herons and many more species. "b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations)" - As a community we have seen no plans for sufficient access to services. The local school, doctors, dentists etc are full! A community should not be grown to the extent stated above without mitigation certain and planned. - The Calderdale Sustainability Report for Option 4 shows uncertain impact for accessibility to essential services. Also, the sites are more than 2km from a railway station and have limited bus services and thus access to sustainable forms of transport. This also goes against policy guidelines. Flooding - I also question the ability to build quickly on LP26, LP177, LP952 and LP1625 due to local flooding issues. Many of these issues occur further up the hill in Upper Greetland with natural spring water that flows from Norland.

There are ample cases where spring water has been diverted either naturally or due to building works and this then has a knock on effect on to the LPs states. This is often due to water that has been diverted due to building higher up and insufficient up-keep of pipes on private land. - In addition to surveyance of LP26, LP177, LP952 and LP1625 a full investigation of the water flows throughout Greetland needs to be conducted. LP26, LP177, LP952 and LP1625 act as a flood plain for the whole hillside. Building on these run-off areas should not start until the knock-on effect has been calculated for the whole village. - Indeed, this links to information on the Planning Portal PPS15: Planning and Flood Risk which states "B10 New development, whether building works, engineering operations or changes in land use, can increase flood risk. Most simply, siting a building within an area likely to flood will increase the direct risks to that building. The greater the quantum of construction, the greater the consequences of a flood event are likely to be. While the direct consequences of flooding for a building are generally readily identifiable, less obvious but equally significant indirect impacts can be caused elsewhere. <https://tinyurl.com/vyeaxrr> Is the council satisfied that indirect impact of flooding elsewhere in the area has been adequately assessed and risks mitigated? - The Sustainability Assessment report for LP26, OBJECTIVE 7 TO REDUCE THE RISK OF FLOODING AND RESULTING DETRIMENTAL EFFECTS ON PEOPLE AND PROPERTY is reported as Uncertain. 'Overall the impact on this SA Objective is uncertain, and any impact will be dependent on the design of any future development and any mitigation measures.' How can land be released when a full risk assessment has not been carried out? - LP177 has a negative outcome for this objective. NPPF paragraph 91 states "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." - Building on LP26, LP177, LP952 and LP1625 would have a detrimental effect on healthy lifestyles of the Greetland Community. These open spaces are often used for walking. The effect of existing open space on the community's mental wellbeing is also important. The World Health Organisation on its own website states: "Green spaces also are important to mental health. Having access to green spaces can reduce health inequalities, improve well-being, and aid in treatment of mental illness. Some analysis suggests that physical activity in a natural environment can help remedy mild depression and reduce physiological stress indicators." <https://www.who.int/sustainable-development/cities/health-risks/urban-green-space/en/> NPPF 94. "It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education." - The current capacity of Greetland Academy on a split-site is well suited to the size of village. Currently, children within the village can access the school with intake occasionally taken from some surrounding villages. If over 600 new houses are built then a situation will arise in which demand will outweigh supply, families who live in Upper Greetland, and even close to the KS2 site, will be forced to leave the village and drive to other schools to find a place as they will no longer be in the catchment area. Greetland Academy is already a 2 class intake. This enables it to maintain a village school atmosphere. As an Academy this school cannot be forced to expand so where is the plan for additional school places? NPPF Paragraph 117 states -"Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land"- Is the Inspector satisfied that Calderdale has fully investigated all brownfield sites for housing purposes? Residents are not convinced this is the case! Greenbelt is being destroyed because developers are more interested in building on it! - The inclusion of this number of homes along Saddleworth road will significantly increase air pollution and I would challenge Calderdale Council to model this effect in order to understand true mitigation. This is especially serious as the location is so close to a primary school and a preschool. The locations of these schools are on the main road and at water level. We have seen no modelling of the potential increase in harmful emissions that I am aware of and the effect this would have not only on the wider community but vulnerable school children. - The NPPF under

paragraph 170e highlights that new developments should not add to air pollution. Increased car usage from over 600 new houses will lead to increased air pollution. Objective 10 in The Sustainability Assessment reports for all of these LPs in Greetland has been marked uncertain and hence these plans are not necessarily in coherence with the NPPF because the plan does not ensure that there will not be an increase.

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

Duty to Co-operate Reason:

Duty to Cooperate Under the Localism Act 2011, Section 33A "Duty to co-operate in relation to planning of sustainable development", Paragraph 3 lays out the duties required of the local council of which points a and b require preparation of local plans. Point d however calls for "activities that can reasonably be considered to prepare the way for activities within any of paragraphs (a) to (c) I question if Calderdale has sufficiently carried out all all activities needed to form a sustainable local plan with specific reference to show that release of Green Belt in LP26, LP177, LP952 and LP1625 meets exceptional circumstances?: - i.e. has all brownfield been explored as per NPPF paragraph 137? Has land recently regraded to brownfield on LP177 at the end of Ellistones Lane, and pending vacation of the Freundenberg factory been considered? It is CPRE's view after meeting local residents that they consider these brownfield sites broadly positive. - I also question if there has been adequate exploration of infrastructure requirements and mitigation for a 33.8% growth in a community? - The council has provided a Sustainability Appraisal Report. However, under preferred Option 4, 9 of the 17 objectives analysed have been marked as -"uncertain" impact. I question how fully the necessary 'activities' needed to form a sustainable plan have been carried out? e.g. risk assessment and necessary mitigation. How can a plan be sustainable and Green Belt destroyed when there are so many question marks? At a site level: LP26 has 10 uncertain impacts, 1 negative and only 1 positive LP177 has 9 uncertain impacts, 4 negatives and only 3 positives LP952 has 11 uncertain impacts, 2 negatives and only 3 positives LP1625 has 11 uncertain impacts, 1 negative and only 4 positive Disclaimer: I am a lay person, not a lawyer or planning expert and refer back to my comments under 'is the plan legal'. If these questions have been answered incorrectly or insufficiently it is due to the process having neither clarity or simplicity of use.

Suggested Modifications:

I feel that there more adequate site assessment including greater risk analysis is necessary before a site allocation of this number can be released from greenbelt and the plan deemed sustainable. Also, I'd ask the council to revisit an analysis of brownfield sites for any new and existing opportunities both in our authority and within neighbouring authorities.

Comments:

Additional Evidence Link:

Comment ID **HRU350**

Site ref (if applicable): **LP1625**

Person ID: **1242408**

Name: **Miss Bryde Town**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Please see attached PDF

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

Sound Reason:

Please see attached PDF

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

Duty to Co-operate Reason:

Please see attached PDF

Suggested Modifications:

N/A

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5600228>

Comment ID **HRU456**

Site ref (if applicable):

Person ID: **1242613**

Name: **Ms Rowena Burton**

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 proposals are not sound for any of the designated sites in Greetland for the following reasons:- The prediction of economic growth is based on out of date figures (2016) which were pre-Brexit. It is difficult to see where 600 new households in Greetland would find employment locally; it is more likely that we would be a dormer village serving Manchester and Leeds. When development is proposed, there is talk of affordable housing and best use of space, but in reality, developers are not held to account - all we see in this area are executive 4 or 5 bedroom homes that take up lots of space and don't serve the community. Most egregiously, the plans go against the NPPF's Green Belt policy: there would be -"unrestricted sprawl"- "merging of neighbouring towns" and no -"safeguarding the countryside from encroachment." West Vale and Greetland would become a huge housing estate without amenities, no sense of community, no visual amenity and no Green belt land for recreational purposes. There are still unused brownfield sites in Calderdale (including West Vale) so there is no evidence that there is an - "exceptional circumstance" to take away the Green Belt for ever, especially in an era when every person and institution should be doing their best to mitigate the effects of climate change. Development on Green Belt completely undermines your vision of -"a preserved, enhanced natural landscape," p.26 of the Local Plan Vision. People who live locally don't want to and should not have to travel on a daily basis to another recreational Green Belt area in Calderdale when they currently have open space and a wildlife corridor on

the doorstep. The contention is that the proposed development is sustainable, but nothing could be further from the truth:- Siting development with the proposed access at the bottom of Scar Bottom Lane is problematic. The road is mostly unadopted, single track with no passing places and eroded at the top (combination of lorries and water). It will not be possible to stop potential new residents using Scar Bottom Lane as a rat-run between Rochdale rd and Saddleworth rd. The Highways department has already refused planning permission on several occasions because of access and safety issues on Scar Bottom Lane. Currently, there are long traffic queues at the traffic lights in West Vale ( at both Saddleworth rd and Rochdale rd junctions) and not just in the morning and at the end of the working day. Road improvements on the A629, A58 and M62 will not help this situation as residents and those from outside the area forced to come through Greetland have to brave West Vale before reaching the improved road systems; indeed the improvements could engender more traffic keen to travel to bigger urban areas. The roads in the villages are single track with no viable prospect of changing to dual carriageway. 600 houses would involve at least 1,200 more vehicles on the roads leading to West Vale. Tinkering with the sequencing of traffic lights isn't going to help. It is already possible to smell and taste the air pollution on the approach to West Vale at busy times. A huge increase in the volume of traffic can only have a detrimental effect on the physical and mental well-being of residents. Levels of pollution may be illegal - when was a study last carried out? The Council could already be in contravention of the Clean Air Strategy 2018. The schools (primary and secondary) and doctor's surgery are already oversubscribed. There is nothing in the plan to remedy this situation or the fact that regeneration in West Vale has been about restaurants and night-life and not about catering for the every day needs of the vast numbers of prospective new families in the area, were the plan allowed to go ahead. On page 24 of your initial Local Plan Vision you commit to - "ensuring the risks of flooding are significantly reduced." Building houses in Greetland flagrantly contradicts this intent. The lower areas of the proposed sites act as flood plains and uncharted springs and water courses are everywhere on the hillsides. Engineers who dealt with our flooding on Scar Bottom Lane in 2015 (the water from here then flooded properties and land below in Saddleworth rd environs - it has to go somewhere) said it would be very unwise to build on the hillsides or the flood plains as the water course is so unpredictable. Every year in this area, private property and land is flooded, but different people are affected because the course of the water changes. Losing the flood plains would cause a back-up of water further up the hillside and the loss of green land to development would mean more flooding as there would be nothing to absorb it on its journey. Stop press: the most recent flooding on 9/2/2020 clearly demonstrates why taking away Greenbelt land is reckless. We have had localised flooding on Scar Bottom lane for months now. The developers who own the land have failed to mend infrastructure which would have ameliorated the situation so the Council kindly agreed to sub-contract a firm to mend the pipes. The road was dry for a week until Ciara struck and demonstrated how the whole area is vulnerable to flooding.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU460**

Site ref (if applicable):

Person ID: **1242405**

Name: **Mr Michael Bridgman**

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:

Building on this potential development site does not comply with NPPF policy. Not only are the properties likely to experience flooding due to changes in the flood plain run off but, in addition, the development is highly likely to cause flooding further down the valley in existing properties such as those on Woodfield Drive. Flooding issues, as with recent occurrences, will even result in sewers overflowing into the beck causing further environmental damage. This type of disaster constitutes a major Health and Safety risk to residents, especially young children and indeed to the wildlife which is important to this locality Surely a main function of Green Belt land is to act as a buffer, to provide open spaces for residents and to prevent excessive urban sprawl. This development, as with the others in the Greetland area, will erode our Green Belt area completely and the public right of way which runs the full length of the four proposed developments in Greetland will be totally devalued destroying this important landscape for ever No feature of the planning of this development can be considered to be sound except perhaps to meet a Council housing target

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU468**

Site ref (if applicable):

Person ID: **1242431**

Name: **Mrs Nicola Boon**

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:

1) Disproportionate amount of building in the Greetland area. The latest revisions to the local plan are deeply unsustainable development particularly the fact that a disproportionate amount of new homes are proposed on four sites in Greetland which for the plan is grouped under Elland. Within the plan 1,708 new housing sites have been proposed within the Elland area with 1,041 of these units (over 60%) proposed in

Greetland when there are other sites available which won't place as much collective strain on one village.

2) Additional Flood risk LP0026 -Currently this site provides a natural overland flow storage area prior to it flowing over Saddleworth road down into Black Brook. It was evident on Sunday 9/2/20 following the rainfall similar to the 2015 Boxing Day floods that any hard landscaping/alterations to the natural characteristics of this area would provide further runoff onto Saddleworth Road and subsequently Black Brook. This land is vital absorption area to prevent overland flow therefore it is strongly advised not to develop on this piece of land. LP0177 / LP0952 / LP1625 All three of these parcels have demonstrated their unsuitability for development during Storm Ciara 8/2/20 & 9/2/20 whereby rainfall levels were close to the 2015 Boxing Day floods. Water has been visibly running over ground and within the ground down the sloping nature of the land down to Black Brook causing flooding to the properties along Black Brook and also contributing to the already at capacity River Calder causing extensive flooding. Parcel LP0177 which clearly lies with Flood Zone 3a has been particularly affected today with extensive flooding. Development will not ease or mitigate this flood risk as there is no substitute for nature's only defence within periods of rainfall which is a floodplain which this last is! The other two parcels did not necessarily flood to the same extent however the flow of water which these fields were taking today, from higher up the valley and Saddleworth Road runoff, provided important lag time to this flow further working with this natural defence mechanism which the valley holds currently. Development would destroy this natural defence barrier and also disturb the watercourses which aren't visible above ground such as the minefield of uncharted natural springs ; which from local knowledge have been re-routed following excavation for developments causing issues elsewhere in the village. No amount of development engineering will be able to improve the hydrology of this valley. See photos below of Black Brook from 9/2/20

3) Sustainable development These pieces of land are clearly within an area of Greenfield and is a natural break in the boundary of the village into the countryside leading up to Barkisland with only existing farmsteads currently situated on the land. If these parcels are to be developed it would not be a sustainable development, it would merely be urban sprawl of a village. Sustainable development would be re-using Brownfield sites not Greenfield sites which are available in West Vale or less sensitive areas in Stainland which were removed from the previous Local Plan.

4) Traffic impacts West Vale is currently at breaking point with the amount of traffic which passes through on a daily basis therefore why would the situation improve with a further 600 homes. West Vale is a vital access route for the valley and surrounding towns and villages and with additional vehicles, a natural bi-product of development, would become dangerously congested. There is no obvious solution to ease the pressures of traffic on West Vale and despite attempts in process of improving the A629 junction, Rochdale Road crossroads still this doesn't make it acceptable to subject near double the number of vehicles as research shows below. WSP Parsons Brinckerhoff Report on Transport Network states that: "£ This report identifies that traffic congestion at the junction of Stainland Road-Saddleworth Road would increase by approximately 105% "£ This report also identifies that traffic congestion at the juncture of Stainland Road-Rochdale Road would increase by over 100%

5) Impact on Air Quality This undoubtedly will deteriorate with the development of any of these parcels due to increased traffic from both construction and occupants. This is why there is a need to plant more trees within the Ward. This will be negated by the building of so many houses. The current air quality needs to be assessed.

6) Infrastructure As a resident of Greetland who drives along Saddleworth Road and Brian Royd Lane daily I believe that the existing infrastructure of the village would not cope with the additional development proposed. Over the last few years there has not been a month gone by whereby there has not been a water main burst on Saddleworth Road due the aging cast iron water main which has still not been upgraded fully causing regular traffic disruption. The road itself is poorly maintained by the council and now you are wishing to subject to road to all the construction related traffic which would be as a result of development and furthermore the occupants upon its completion. Local Schools are all full - both Greetland Academy and Brooksbank, Elland. The land allocation has not made any reference to providing land for expansion of the Key Stage 1 site on Saddleworth Road which would be effectively surrounded by LP0177. Our children of Greetland would lose the rural outlook and ability to be taught about this vital wildlife corridor and would end up being brought up and educated in an urban environment ; as a parent

of a Key Stage 1 pupil this outlook and important wildlife corridor was one of the attractive qualities of the Greetland Academy. With a proposed 600 houses, using Calderdale MBC's figure for school places of .36 per household (IDP section 9.14) this indicates another 206 places would be needed. Local Dentist has a waiting list of 600 for NHS places. The nearest NHS dentist was recently found (July 2019) 11 miles away in Kirklees. The GP Surgery would be strained to take this proposed capacity given when the practice is already on a waiting list basis for new patients with patient levels already at 11,334 patients in 2019 covered by 5 doctors. There would also be a further strain on local Hospitals. On the basis of the above points I strongly advise that the greenfield sites within Greetland are removed from the Local Plan in favour of more suitable sites.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5602886>

Comment ID **HRU478**

Site ref (if applicable): **LP1625**

Person ID: **1242401**

Name: **Mr graeme britteon**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Please read this section of the Consultation Portal in conjunction with the comments I have made in the other two sections as many comments are relevant to all sections available on the Consultation Portal. The Local Plan does not address the implications of the National Planning Policy Framework, especially, NPPF Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. The site assessment for LP0026 shows that out of 17 Sustainability Assessments, the allocation has 10 Uncertain Assessments and 1 Negative Assessment. According to the NPPF Para 143 under 'Proposals affecting the Green Belt' it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' Those very special circumstances simply do not exist and all other more appropriate sites should be included in the Plan before Green Belt sites such as this one. There are no justifiable exceptional circumstances for change of use of this area of Greenbelt land. Although Calderdale Council do recognize some (but by no means all) elements harmful to the Green Belt in their plan, they offer only feeble mitigation against that harm. Calderdale Council need to demonstrate that the Local Plan will enhance those areas where development is proposed and that the development will not negatively affect the existing local communities and the environment in which they live. They have singularly failed to do this. I feel that these plans have not been properly considered and I strongly believe that they will negatively impact upon the environment and the quality of life in the community for years to come.

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



#### Sound Reason:

Please read this section of the Consultation Portal in conjunction with the comments I have made in the other two sections as many comments are relevant to all sections available on the Consultation Portal. Calderdale Council is basing its estimate of the future need for houses on out-dated information. As we are no longer members of the EU it should revisit those estimates. I do not believe that overall requirement for housing will be as great as stated. In reference to this site reference number, LP1625, and sites LP0177, LP0026, and LP0952, there are a number of issues which apply as a result of the scale of proposed development in the Greetland area. There seems to be a grossly disproportionate emphasis that the Plan has upon some communities, particularly Greetland, which are accommodating far in excess of a fair, reasonable and balanced share of development given their relative size. The resulting 'Urban Sprawl' that this plan would create in the Greetland area will have many negative consequences for residents and the environment, such as higher water and air and noise pollution, increased traffic fatalities and congestion, and increased car dependency. The traffic congestion issues, already evident on Saddleworth Road and Stainland Road, do not appear to get any significant recognition in the plan and adding 600 houses at the side of Saddleworth Road will only serve to exacerbate the problems. The potential increase in car journeys in the area will undoubtedly contribute to increased air pollution, particularly affecting vulnerable young children walking to and attending the local school at the side of Saddleworth Road. The existing infrastructure barely meets the needs of the current population of Greetland so increased capacity of schools, dentists, and GP surgeries would be needed to service such a significant increase in the local population. The development of these sites would be against all five functions of Green Belt and, most decisively, would mean the coalescence of Greetland and West Vale and the deterioration of the identity of both places, thus undermining the Council's Settlement Hierarchy. This area of Greetland has an abundance of wildlife due to the natural and undisturbed environment. When walking up the valley I have seen heron, kingfishers, dippers, nut hatches, kestrels, owls, pheasant, and woodpeckers. I have seen foxes, deer, moles, and field mice in the fields above Black Brook and observed brown trout in the brook itself. We have also watched the bats flying around our garden in the late summer evenings. Development here would eradicate a number of species who are reliant upon the Eco system which currently exists here. There are also ecological constraints with regards to Black Brook as it is a UK Biodiversity Action Plan Priority Habitat. In addition, the Woodland Trust has recently supported an application for the donation of over 100 indigenous trees specifically recommended for this area. There are many natural springs on the hillsides above Black Brook which run down through sites LP0026, LP0952, and LP1625, and site LP0177 (a high risk flood area) is partly situated on a natural flood plain. Any development on these sites, which act as a natural and essential soak away, would add to the run off of rain and spring water and would exacerbate potential flood damage further down the valley, into West Vale and beyond. To comply with current legislation on flooding these sites should be removed from the plan. Large open spaces are needed for the mental and physical health and well being of all. Urban sprawl has many negative consequences for residents and the environment. The wooded valley walkway along the side of Black Brook provides a popular area for many of the local residents to enjoy leisure activities (walking, running, cycling etc.) away from the rigors of everyday life and free from traffic and air and noise pollution, yet within walking distance of existing communities. This is an invaluable asset to the community and must be safeguarded from any future development.

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

#### Duty to Co-operate Reason:

Please read this section of the Consultation Portal in conjunction with the comments I have made in the other two sections as many comments are relevant to all sections available on the Consultation Portal. I have significant concerns about the way in which the process of producing the Local Plan has been conducted. I believe that Calderdale Council should have made more of an effort to communicate the process of the Local Plan to residents and raise awareness of the consultation. I also think that Calderdale

Council have produced a website which is not fit for purpose. It is far too difficult and time consuming process for people to respond to the proposals online, a point which may significantly reduce the number of objections and comments about the plan.

**Suggested Modifications:**

That the 4 sites in Greetland (LP0177, LP0026, LP0952, and LP1625) be removed from the plan.

**Comments:**

**Additional Evidence Link:**

Comment ID **HRU501**

Site ref (if applicable): **LP1625**

Person ID: **1241765**

Name: **Mrs Sandra Britteon**

Organisation:

Agent ID:

Name:

Organisation:

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

**Legal Compliance Reason:**

The plan involves allowing development housing in our Green Belt areas. Areas that have been, and should always be, protected. Protected from the conglomerate developers that seek to destroy our communities, steal our green tranquil spaces, and make profits at all costs. The site assessment for LP1625 has no Sustainability Assessments. Under 'Proposals affecting the Green Belt' NPPF Para 143 it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' There are no justifiable exceptional circumstances for change of use of this area of Greenbelt land. Calderdale Council do appear to recognize some harmful elements harmful to the Green Belt in their plan but they offer little in the way of mitigation against that harm. The plan seems to give little value to 'The value of 'Open Space and Recreation' and 'Access to a network of high quality open space' and the Environmental Health section of the Site Assessment Report states that 'There is no significant detrimental effect that cannot be mitigated against'. How can Calderdale Council mitigate against the loss of Greenbelt land, the loss of open spaces and valuable countryside on our doorstep, and the decimation of all the environmental benefits that are provided by them and which are currently enjoyed by your local community? These green spaces are very very important to me and my family and I would hope that they can be valuable to generations to come.

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

**Sound Reason:**

There are several issues with the soundness of the plan for this site which are also applicable, individually and in total, to all these sites (LP0026, LP0177, LP0952, and LP1625) in the Greetland area: All these sites are marked as Greenfield but should, in truth, be marked as Green Belt sites. All perform strongly against the 5 Green Belt purposes. As such they should be designated as 7th or 8th on the list of suitable sites according to Calderdale Council's own Sustainability Appraisal 2018 document. The land earmarked for housing in the Greetland area falls within the wider Elland region and there is a disproportionate allocation to Greetland than other parts of the Elland region, with Stainland not being allocated any housing at all. There is a significant risk that 'Urban Sprawl' will further nibble away at the surrounding countryside and there will be many negative consequences for residents and the environment, such as higher water, air, and noise pollution, increased traffic fatalities and congestion, and increased car dependency. The traffic

congestion is already a major problem at the junction of Saddleworth Road and Stainland Road and at the junction of Rochdale Road and Stainland Road. Recent road works have a major devastating effect on travel times through these two overstretched junctions. Adding 600 houses at the side of Saddleworth Road will only serve to exacerbate these problems. Air pollution is another issue that will be affected by such a large scale addition of houses in a relatively small space along side a single main road. The potential increase in car journeys in the area will undoubtedly contribute to increased air pollution which will particularly effecting vulnerable young children walking to the local school at the side of Saddleworth Road. The existing infrastructure struggles to meet the needs of the current population of Greetland so increased capacity of schools, dentists, and GP surgeries would be needed to service such a significant increase in the local population. Sewers are already prone to flooding and overflowing causing further health hazards. The area around these four sites is mainly Grade 3 agricultural land which by Calderdale's own recognition in the Sustainability Report will become an increasingly important commodity in the light of climate change. The Woodland Trust has recently supported an application for the donation of over 100 indigenous trees specifically recommended for this area. The hillsides above Black Brook are riddled with natural springs from the moors which run down through sites LP0026, LP0952, and LP1625, and site LP0177 (a high risk flood area) into Black Brook and to a natural flood plain along side it. Any development on these sites, which act as a natural and essential soak away, would add to the run off of rain and spring water and would exacerbate potential flood damage further down the valley, into West Vale and beyond. To comply with current legislation on flooding these sites should be removed from the plan. Large open green spaces are required for the mental and physical health and well being of all and Urban sprawl has many negative consequences for residents and the environment. The wooded valley walkway along the side of Black Brook provides a popular area for many of the local residents to enjoy leisure activities (walking, running, cycling etc.) away from the rigors of everyday life and free from traffic and air and noise pollution, yet within walking distance of existing communities. This is an invaluable asset to the community and must be safeguarded from any future development.

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

Duty to Co-operate Reason:

There are significant concerns about the way in which the Local Plan has been formulated and worries too about the involvement and influence of major developers on the selection of suitable sites. I feel that Calderdale Council should have made a better effort to communicate the process of the Local Plan to residents and done more to raise awareness of the consultation. I also think that Calderdale Council's website is a maze of screens, reports, and links, that are very difficult to navigate through and to fully understand. Their user guidelines are minimal and provide no real help in getting you to the right place to make a comment. It is a far too difficult and time consuming process for people to respond to the proposals online, a point which may significantly reduce the number of objections and comments about the plan.

Suggested Modifications:

That the 4 sites in the Greetland area (LP0026, LP0952, LP0177, and LP1625) be removed from the plan.

Comments:

Additional Evidence Link:

Comment ID **HRU502**

Site ref (if applicable): **LP1625**

Person ID: **1242362**

Name: **Mrs Elaine Scott**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

It ignores all planning advice/requirements regarding environmental and social issues.

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

Sound Reason:

No proper account is taken of the following- Flood risk - We are all aware of the devastation caused in Elland in 2015 and more recently 9th Feb 2020 when all the Greetland sites in this plan were affected and again west vale and Elland had road closures due to flooding. Many of the other objections provide photographic evidence of this. Preservation of wildlife corridor. This area is home to many species of wildlife and should be protected. Congestion in West Vale- Leading to further reduction in air quality and potential health risks for this and future generations. Lack of infrastructure- Local schools are already over subscribed .GP and dental facilities would be unable to cope with the increase in population. The Defra 25 year environment plan clearly states- We will protect ancient woodlands and grasslands, high risk flood areas and our best agricultural land, protect our green belt to make this land a breathing space for our urban populations to enjoy and our wildlife to flourish. MPPF explains in paragraph 80 the 5 purposes of green belt land, I think this speaks for itself, any development on this site goes totally against these 5 functions and against the Defra plan.

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

Duty to Co-operate Reason:

The consultation period is minimum. Very little information has been given to local residents who therefore have insufficient time to consider, prepare and submit objections.

Suggested Modifications:

The only option is to remove this site from the plan and consider more suitable brown field sites.

Comments:

Additional Evidence Link:

Comment ID **HRU505**

Site ref (if applicable): **LP1625**

Person ID: **956607**

Name: **Mr David Scott**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Please see attached document.

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

Sound Reason:

See attached word document.

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

Duty to Co-operate Reason:

Very little time to prepare our objections and no notice from the Council to local residents that these sites had been put back into the local plan.

Suggested Modifications:

Please see attached word document

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5604895>

Comment ID **HRU527**

Site ref (if applicable):

Person ID: **1242903**

Name: **Mr Martin Moorman**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

This plan in the Greetland area under application numbers LP0952, LP0177 and LP1625 cannot be justified on the grounds of flooding risk, infrastructure concerns including local school and medical practice places and for traffic congestion and climate concerns.

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

Sound Reason:

The housing plan for approximately 60 new houses in the Greetland area is unsound. The areas identified are flood plains and have been proven to flood both in December 2015 and as recently as 9 February 2020. Houses built in this area will flood: FACT

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU534**

Site ref (if applicable):

Person ID: **1242842**

Name: **Mr Simon Matthews**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

The proposals do not fit the spirit, or specific detail of many paragraphs, of the National Planning Policy Framework. However, I do not feel qualified to comment on the legality of the Local Plan document.

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

Sound Reason:

Green Belt The site LP1625 does not meet the requirements of the five tests for use of Green Belt land NPPF (para 134) or show any exceptional circumstances (para 144) where such building could be allowed, but would not maintain openness and instead contribute to urban sprawl (para 133). This is at odds with government's claim to protect the Green Belt ; as reflected in Esther McVey's suggestion that once Green Belt land is built on, it will be gone, probably forever. NPPF para 145 suggests that new building should be focussed on affordable housing for new-entry purchasers, concentrate on sustainable development and use of brownfield sites wherever possible (para 63), and seek to avoid harm to the openness of the Green belt; however, plans already advertised for local building refer only to 4-6 bedroom luxury houses, not starter homes (as less profit?). Current figures for new housing are built on out-of-date predictions on economic growth in the area; further, if development 18/01189/FUL at West Vale goes ahead to build housing for elderly people, this would free up housing locally so that fewer new houses would be required. Environment and Wildlife NPPF para 174 describes the need to protect enhance biodiversity, habitat and wildlife corridors. This proposed development would do unknown harm to many species ; we regularly see deer, bats, foxes, herons, woodpeckers in the woods by our property, and hear owls most nights, and proposed developments in the area will also lead to loss of mature trees. In addition, the ability to enjoy the environment and walk in green areas is acknowledged to be beneficial to mental & physical health and social well-being (para 8) ; there is a public footpath that runs up the side of this site. Flooding NPPF para 155 states that - "inappropriate development in areas at risk of flooding should be avoided" and that - "development should be safe without increasing the flood risk elsewhere" and also - "to seek to use more sustainable locations where flood risk is likely to be increased" (para 157). When our house was flooded in 2015/16 (on the hill above LP0026), the council engineer told us at that time there is no comprehensive plan or knowledge of the many springs and streams on the land in this area, and a Yorkshire water engineer said the land should not be built on! We already have issues with run-off every time there is a major storm (this week, the storm run off has shattered our waste water pipe and washed away the topsoil, leading to flooding of the bottom of our garden to knee depth) and this water all has to go somewhere. The removal of large areas of grassland reduces the ability of the land so act as a sink for this water as well as leading to an increased risk of flooding to properties and land below us ; part of the the field to be used for LP0026 has visibly suffered from water damage and becoming waterlogged for much of the last four years. Ironically, the junction of Saddleworth Road and Scar Bottom Lane has needed to be dug up for long periods at least three times in this period due to water mains failure leading to our loss of water supply! Yet the council proposes building on this land and other sites sitting on a flood plain - where will the water go? Given that this problem is, and will be exacerbated, by climate change, how does this constitute making provision to mitigate the effects of climate change and increased flood risks? [unable to load video and photographs of the recent flooding] Air Pollution NPPF para 181 talks about improving Air Quality management plans and Clean Air Zones. Given the likely increase in traffic expected due to potentially over 1000 new cars from the development proposed of 600 new houses, it is difficult to see these as being compatible; nitrogen oxides and particulate emissions are likely to increase, especially due to queues at

peak traffic times in West Vale, leading to a decline in air quality in the village, including around the local primary school. Infrastructure NPPF 102 requires consideration of avoidance and mitigation of adverse effects of impact of any changes to transport infrastructure. With the building of 600 new houses along Saddleworth Road, the pressure on West Vale junctions is set to increase by over 100%; currently, a journey yesterday to Elland and back in the early afternoon involved over twenty minutes sat in queues for the traffic lights with Stainland Road. Improvements in the wider area, including a railway station at Elland and new M62 junction, will do nothing to alleviate the local situation in West Vale and will actually exacerbate the problem as many of the people relocating here will have to travel to the local cities for work. The inadequate nature of the local public transport means that the vast majority of commuters have to use private cars for journeys; as there are no local amenities within 500m of most of the new developments, this will also increase local journeys into West Vale (as outside the -"edge of centre"- radius), putting further pressure on parking in the village. The roads off Saddleworth Road are very narrow and already heavily used ; I have witnessed accidents due to the lack of space, one involving the local small bus and another with a van. With the introduction of construction traffic, travelling around the area will become more difficult ; the proposed mini-roundabout is unlikely to have any effect unless the roads can be widened. Most of Scar Bottom Lane is unadopted and pot-holed, yet still used along with Brian Royd Lane, by some locals to cut through to Rochdale Road - this will be made a lot worse with the developments along Saddleworth Road if built, as drivers seek ways to avoid the congestion in West Vale. Lack of capacity in the local schools and health centre/dentist provision is also of great concern to many of the local residents. There is no evidence of increased provision of school places (para 94), or shops close to the new developments. The new developments would lead to a loss of identity in the current village community, as well as a removal of green areas for social recreation. Ironically, residents would have to take more journeys to reach an area for walking or to enjoy wildlife etc.!

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

Duty to Co-operate Reason:

I feel unqualified to state whether the Local Plan is compliant with the Duty to Co-operate

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU552**

Site ref (if applicable): **LP1625**

Person ID: **1241732**      Name: **Mr. Cory Greidanus**      Organisation:

Agent ID:      Name:      Organisation:

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

Legal Compliance Reason:

Poor Public notification and little time allowed for proper consultation. This Portal is very confusing and hugely difficult to navigate. Many people will be unable to put forward their views on the plans. Many people wont even be able to find Where to complain, because these sites in West Vale and Greetland have been listed under Elland. West Vale and Greetland are not in Elland. Section 1.2 of the Calderdale SCI 2015 calls for Clarity. -"We need to be very clear about what we are asking people and we must be sure that

people understand what will happen as a result of this engagement. This includes being clear about what decisions have been made, what have not, and who will make the final decision." This clarity does not exist, people are confused about the whole process. Disproportionate growth of 33.8% to the Greetland Community which contradicts Greenbelt policy to restrict urban sprawl. Within the Potential Sites considered and rejected report CC37, LP1028, which is also in Greenbelt, had a planned site of 122 dwellings removed. One of the reasons stated is that it would give a "disproportionate increase to Barkisland village". The increase based on the same dataset above would have been 16.6%. If Barkisland can be pulled out of its grouping with Ripponden and Rishworth then we suggest that Greetland can be distinguished from Elland. If 16.6% is disproportionate to one village why is 22.4% or even 33.8% not disproportionate to another?

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

Sound Reason:

Main points of Objection : Flooding Risk Loss of large area of Green Belt and Wildlife Corridor Current Chronic Congestion in West Vale, and the effect on Air Quality Lack of Infrastructure Flooding Risk The risk of flooding to the Greetland and West Vale areas, as well as further downstream into Elland, are of paramount importance in my objections to development on this site. I have lived adjacent to the site in question for the past 18 years, and can confirm that it floods regularly, and often 2 or 3 times in the same year. I am attaching photos that show some of the more severe flooding, photos taken in 2004, 2007, 2012, 2015 and 2019. As the photos show, the flooding is quite severe, and much of the proposed site is under water. This happens regularly, this is not a one-off occurrence. UPDATE: It has flooded again in 2020!!! Storm Ciara flooded the fields again on February 9, 2020. As I type this Storm Dennis approaches, the army has been called into the Calder Valley to shore up all the flood defenses that failed last week. This is getting beyond a joke. These sites are a high risk flood area, within an area highly at risk to flooding. The Environment Agency defines a high-risk flood zone as one where there is a 1 in 100 chance of flooding in any given year. This field floods far more often than that. I've attached a screen shot taken directly from the Environment Agency website, which shows the extent of flooding from surface water across the site. The photos show that these sites are a perfect example of a flood plain at work; soaking up excess water at times of heavy rainfall, allowing space for the water to flow and be stored in times of flood, even after the river has burst its bank, and protecting land further downstream from potential flooding. The DEFRA 25 year plan states: "National flood management involves the use of a variety of measures, including tree planting, river bank restoration, building small scale woody dams, reconnecting rivers with their flood plains, and storing water temporarily on open land." Developing this floodplain area would be in direct opposition to National flood management. The exceptional floods of Boxing Day 2015 led to much damage further downstream, and eventually to the collapse of Elland Bridge. The repair bill for the bridge alone came in at £4 million, while the total economic impact to the Calderdale and Kirklees regional economy amounted to a total of approximately £170 million. (Economic Impact Assessment of the Boxing Day Floods (2015) on SMEs in the Borough of Calderdale) If the proposed scale of development along Saddleworth Road is allowed to go ahead, and these valuable flood plains are built over, then the events of 2015 will become a much more regular occurrence, leading to untold costs to the communities of West Vale, Greetland, Elland, and even further downstream. The current policy and legislation on flooding states - "due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere. And Chapter 14, paragraph 163 of the NPPF states: - "When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere" It is clearly the case that any future development of the site LP1625 would itself be under serious threat of severe and repeated flooding, and it would also put neighbouring communities in much greater danger of flooding. I believe this is a strong enough argument on its own to remove this site from the Calderdale Local Plan. Loss of large area of



Green Belt and Wildlife Corridor Protecting or Wildlife Corridor and Green Belt is very important to me. Esther McVey, our current Housing Minister agreed, when she wrote in her policy on Green Belt land: "protecting the Green Belt goes beyond protection against development" Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: (i) to check the unrestricted sprawl of large built-up areas (ii) to prevent neighbouring towns merging into one another (iii) to assist in safeguarding the countryside from encroachment (iv) to preserve the setting and special character of historic towns (v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The site LP1625 as it currently exists as a Greenfield site performs strongly with this criteria. Development of this site seems to fly in the face of the NPPF information. DEFRA (Department for Environment, Food & Rural Affairs) says in their 25 year plan: "New development will happen in the right places, delivering maximum economic benefit, while taking into account the need to avoid environmental damage. We will protect ancient woodlands and grasslands, high flood risk areas and our best agricultural land." Developing site LP0177 also contradicts this. Having lived adjacent to the site for 18 years, I regularly see Herons flying past. Tawny owls and deer are regular visitors, as are bats, foxes and hedgehogs, and I have seen badgers also. The Black Brook is home to Brown Trout. The DEFRA 25 year plan also states their aim to: "Develop a Nature Recovery Network to protect and restore wildlife, and provide opportunities to re-introduce species that we have lost from our countryside" must do everything we can to protect the wildlife in this Wilderness Corridor. The Developing this site with 200 homes would destroy this precious Eco-system. "Having access to green spaces can reduce health inequalities, improve well-being, and aid in treatment of mental illness" says the World Health Organisation. We need to be protecting this space, not developing it. Current Chronic Congestion in West Vale, Greetland and the effect on Air Quality The traffic lights in West Vale, at the junction of Saddleworth and Stainland Roads are a joke. Allowing the Co-op food store to be built right on the junction caused a bad situation to be made much worse. Huge queues extend back up Saddleworth Road (and Rochdale Road) in both directions, as well as up Stainland road every morning, and again each evening. There is simply too much traffic now for this junction to work. Add in an accident on the M62, and suddenly things get far worse again. Major plans may be in place to improve the A629 into Halifax, but these plans will do nothing to alleviate congestion through West Vale and Greetland. If the proposed developments are allowed to go ahead along Saddleworth Road, the congestion will be made much worse yet again. In fact, the WSP Parsons Brinckerhoff Report on Transport Network states that the traffic congestion at the juncture of Stainland Road-Saddleworth Road would increase by approximately 105%. So a traffic junction that is not fit for purpose, and is the bane of my life every morning and evening, (and for every other resident of Greetland, West Vale, Stainland, Elland, Barkisland, and surrounding area that needs to get through this junction every day) is going to be made 105% worse. The proposed development cannot be allowed to go ahead on this site. The effect on Air Quality that all this congestion causes is undeniable. Young children walking to school each day face walking for hundreds of yards past long queues of idling traffic waiting to get through West Vale traffic lights. Greetland Academy actually sits right on Saddleworth Road, as does Sunnybank Pre-school, often with queuing traffic right past the site. West Vale Primary School is right on Stainland Road, surrounded by queues of idling traffic. There are seven existing large companies in the immediate area with Lorries that rely on the motorway, many of which travel up and down Saddleworth road each day, adding to the congestion and the pollution. Air pollution is the biggest environmental threat to health in the UK, with between 28,000 and 36,000 deaths a year attributed to long-term exposure. There is strong evidence that air pollution causes the development of coronary heart disease, stroke, respiratory disease and lung cancer, and exacerbates asthma. This information comes from Public Health England (PHE) in a report from 11 March 2019, in which Professor Paul Cosford, Director of Health Protection and Medical Director at PHE, said: "Now is our opportunity to create a clean air generation of children, by implementing interventions in a coordinated way. By making new developments clean by design we can create a better environment for everyone, especially our children. Key interventions local authorities can take include: redesigning cities so people aren't so close to highly polluting roads." The proposed development plans along Saddleworth Road are in complete contrast to these Public Health England recommendations. They want to build new communities directly on already

highly polluted and congested roads, increasing the threat to all of us. We cannot let these plans go ahead. Lack of Infrastructure Local Schools are full - both Greetland Academy and West Vale primary schools, as well as the secondary school, Brooksbank in Elland. With a proposed 600 houses, using Calderdale MBC's figure for school places of .36 per household (IDP section 9.14) this indicates another 206 places would be needed. And long term residents of Greetland would suddenly see themselves pushed out of the catchment area of their own local school, at the expense of 600 new homes built on Green Belt land surrounding the existing school. Local Dentist has a waiting list of 600 for NHS places. The nearest NHS dentist was recently found (July 2019) 11 miles away in Kirklees. The GP Surgery would be strained to take this proposed capacity. There would also be a further strain on local Hospitals. The proposed plans make no provision for extra school places, let alone Doctors and Dentists. The infrastructure needed to accommodate the size of the proposed development simply does not exist, so the proposed development must not be allowed to proceed. -----

In summary, I have outlined the 4 main reasons why I feel this Local Plan is not sound. In truth, I cannot understand why the council has even attempted to put forward this site for development, given the overwhelming evidence of regular flooding, year after year. It is totally unsuitable for that reason alone. Take into account its protected Green Belt status, the Congestion and Air Pollution it will cause, and the lack of Infrastructure to support the proposed development, and anyone can see that development on this land is unsuitable, and therefore it should be removed from the Local Plan and preserved as Green Belt land. ----- In response to this past weekends (09/02/2020) flooding, Councillor Jane Scullion of the Calderdale Council was quoted in the press as saying: "The Local Plan has been subject to a Flood Risk Assessment and the Environment Agency has been consulted throughout the process. The method that the Council used to identify housing sites ensured that green field sites with the potential to flood were rejected early in the process. Where only part of a site is prone to flooding, the unsuitable parts are excluded from the developable area. Surface water run-off can occur on any site; however, sustainable drainage measures will ensure that wherever possible there is an improvement to the existing situation." I can only imagine that the Council have been misinformed about this site, which doesn't just have the potential to flood, but a virtual cast-iron guarantee to flood, as my photographs show it has done in 2004, 2007, 2012, 2015, 2019, and again in 2020. It's a flood plain, doing what a flood plain is supposed to do. Putting 600 homes across these 4 sites (LP0177, LP0952, LP1625, and LP0026) would be immediately putting those 600 homes in harm's way, as well as increasing the risk of flooding to nearby residents, and to nearby communities further downstream. From the Huddersfield Examiner this week: Flooding is likely to become a regular occurrence in Calderdale - and the government needs to step in. That's the view of Calderdale Council leader Tim Swift following the devastation wreaked by Storm Ciara at the weekend, which hit 500 homes and 400 businesses, leaving infrastructure seriously damaged. And Cllr Swift warned emergencies like this were frequently affecting lives in Calderdale, financially and in terms of people's mental health. Cllr Swift told the Cabinet on Monday: "After the 2015 floods we started to move to a model of recognising this wasn't a one-off event and was about the nature of life in Calderdale and the way we have been impacted by a changing climate. It's clear this for us is a challenge that's quite different to other parts of the country. There is a potential of it being a fairly regular occurrence - we've had three major flooding incidents in less than ten years." he said. If the leader of Calderdale Council can recognize that flooding in Calderdale is going to be a fairly regular occurrence, then surely he can also recognize the folly in building 600 homes on protected Green Belt land; land that serves as a natural flood plain to help minimise the risk of flooding to our communities. This land must be protected, and removed from the Calderdale Local Plan.

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

Duty to Co-operate Reason:

same reasons as above

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5606064>

Comment ID **HRU557**

Site ref (if applicable):

Person ID: **1242981**

Name: **Mrs Pamela Watson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Most residents of Greetland not aware of these proposals. Letter detailing the plans should be sent to each residents. Not everyone able to access internet or visit council offices

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

Sound Reason:

Green belt ( Greenfield doesn't actually appear in national planning policy) Green Belt is put in place to protect our open spaces ,to check the unrestricted sprawl of large built up areas and to assist in safeguarding the countryside from encroachment. There are many disused mills and other brown field sites available in Calderdale, the mill site in West Vale for instance, which could be used. Flooding - These areas flood extensively. Building on these flood plains will result in the water being diverted elsewhere and lead to flooding of properties elsewhere. Traffic Congestion -Have any inspectors responsible for this idea tried to travel down Saddlesworth Road or Rochdale Road into West Vale at peak times. West Vale cannot cope with the traffic now and has become a bottle neck Infrastructure - Our schools, doctors and dentists are already stretched to the limit Quality of Life - This will cause urban sprawl in Greetland taking away our countryside which is home to wildlife and fauna

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

Duty to Co-operate Reason:

Most residents of Greetland are not aware of these proposals.a letter should be sent to each resident detailing the plans. Not everyone can access internet or able to visit Calderdale offices.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU573**

Site ref (if applicable):

Person ID: **955884**

Name: **Mrs Dinah Boylan**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Green belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans - Paragraph 136 of NPPF There are NO exceptional circumstances in this circumstance There WILL be flooding. This area has underground springs collecting the run off water from Daleside and surrounding areas. These have become blocked in the past causing flooding in and around Westfield house below. The field has changed over the past 40 years I have live adjoining the area and the ground has sunk, thought to be due to the water running below and has often had to have repair works to the drainage. This water runs into Black Brook - which is regularly flooding the fields. It is stated the area has archaeological interest, ref SWYOR -6B3838, how can this be preserved?

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

Sound Reason:

The land is not suitable for building. The boundary between the village of Greetland and Barkisland - green belt would be destroyed causing urban sprawl. Calderdale have declared a climate emergency. This development would increase cars by approximately 60 minimum. The impact this would have on the already pressured West Vale junction is phenomenal when put together with the other suggested developments. Standing cars attempting this junction with engines running (as can be seen now) will have a detrimental impact on the children walking to and attending Sunnybank school and nursery. The toxic fumes have been proved to damage health. I walk this route regularly and I find the fumes can be choking. We are trying to improve children's health and encourage them to walk but they should not be expected to encounter this on a daily basis/ Sia Fibral which lies below this site also add to the fumes, the trees in the valley by the golf course have had years of fumes and are very brittle and not hardy. There is a healthy wildlife community here. Deer, hedgehogs, herons, foxes, woodpeckers, bats, owls are simply a few of the species seen here. Where can they go? There will be nowhere if Calderdale continue with what can only be described as a disaster.

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

Duty to Co-operate Reason:

I do not no what this means. I think this site is so difficult and hard to follow. I feel this site would deter many people from objecting- what I thing planning are hoping

Suggested Modifications:

The only modification is to remove the plan entirely

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5606068>

Comment ID **HRU583**

Site ref (if applicable): **LP1625**

Person ID: **1121012**

Name: **Mr James Sinclair**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Please read this section of the Consultation Portal in conjunction with the comments I have made in the other two sections as many comments are relevant to all sections available on the Consultation Portal. Also note that these comments apply equally across applications LP0026, LP0177, LP0952 and LP1625, as taken together they represent a clear and present danger to the health and vitality of the West Vale/Greetland community. The Local Plan does not address the implications of the National Planning Policy Framework, especially, NPPF Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. Site assessments for the 4 proposed development sites in Greetland are overwhelmingly uncertain or negative: LP0026 ; 10 Uncertain Assessments and 1 Negative Assessments. LP0177 ; 9 Uncertain Assessments and 4 Negative Assessments. This site was also refused planning permission in July 2019. LP0952 ; 11 Uncertain Assessments and 2 Negative Assessments LP1625 ; No sustainability assessments! It is inconceivable that given the above, development should be permitted and even more unbelievable that local councillors should support the adoption of the plan! According to the NPPF Para 143 under 'Proposals affecting the Green Belt' it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' Those very special circumstances simply do not exist and all other more appropriate sites should be included in the Plan before Green Belt sites such as this one. There are no justifiable exceptional circumstances for change of use of this area of Greenbelt land. Although Calderdale Council do recognize some (but by no means all) elements harmful to the Green Belt in their plan, they offer only feeble mitigation against that harm. Calderdale Council need to demonstrate that the Local Plan will enhance those areas where development is proposed and that the development will not negatively affect the existing local communities and the environment in which they live. They have singularly failed to do this. I feel that these plans have not been properly considered and I strongly believe that they will negatively impact upon the environment and the quality of life in the community for years to come.

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

Sound Reason:

Please read this section of the Consultation Portal in conjunction with the comments I have made in the other two sections as many comments are relevant to all sections available on the Consultation Portal. Calderdale Council is basing its estimate of the future need for houses on out-dated information. As we are no longer members of the EU it should revisit those estimates. It is clearly uncertain that the overall requirement for housing will be as great as stated. In reference to this site reference number, LP1625, and sites LP0177, LP0026, and LP0952, there are a number of issues which apply as a result of the scale of proposed development in the Greetland area. There is a grossly disproportionate emphasis that the Plan has upon some communities, particularly Greetland, which are accommodating far in excess of a fair, reasonable and balanced share of development given their relative size. The resulting 'Urban Sprawl' that this plan would create in the Greetland area will have many negative consequences for residents and the environment, such as increased water, air and noise pollution, increased traffic fatalities and congestion, and increased car dependency. The traffic congestion issues, already evident on Saddleworth Road and Stainland Road, do not appear to get any significant recognition in the plan. West Vale is currently at breaking point with the amount of traffic which passes through on a daily basis. West Vale is a vital access route for the valley and surrounding towns and villages and with additional vehicles, a natural bi-product of development, would become dangerously congested. There is no obvious solution to ease the pressures

of traffic on West Vale and despite attempts in process of improving the A629 junction, Saddleworth Road and Rochdale Road junctions, it is highly likely that a possible additional 1200 vehicle movements (assuming a 2 car family per household) at peak periods will result in increased congestion and attendant pollution in West vale and surrounding roads. It has also not escaped notice that the proposed modifications to the A629 will result in an additional junction for commuters from West Vale into Halifax to navigate, potentially resulting in even further congestion back into West Vale. WSP Parsons Brinckerhoff Report on Transport Network states that: "Ċ This report identifies that traffic congestion at the junction of Stainland Road-Saddleworth Road would increase by approximately 105% "Ċ This report also identifies that traffic congestion at the juncture of Stainland Road-Rochdale Road would increase by over 100% The potential increase in car journeys in the area will undoubtedly contribute to increased air pollution, particularly effecting vulnerable young children walking to and attending the local school at the side of Saddleworth Road. The existing infrastructure barely meets the needs of the current population of Greetland so increased capacity of schools, dentists, and GP surgeries would be needed to service such a significant increase in the local population. There appear to be no mitigating factors to compensate for the increase of 600 properties in the area. At an average of 4.4 people per property, the population increase of 2640 represents a 25% increase in the potential number of patients eligible for treatment in the local Medical Centre, a service which struggles to cope today. The development of thesesites would be against all five functions of Green Belt and, most decisively, would mean the coalescence of Greetland and West Vale and the deterioration of the identity of both places, thus undermining the Council's Settlement Hierarchy. This area of Greetland has an abundance of wildlife due to the natural and undisturbed environment. The valley is home toan extremely healthy and diverse fauna, including heron,kingfishers, dippers, nut hatches, kestrels, owls, pheasant, woodpecker, bats, fox and deer with trout in the brook itself. Development along the riparian habitat would have a severe impact on a number of species who are reliant upon the Eco system which currently exists here. There are also ecological constraints with regards to Black Brook as it is a UK Biodiversity Action Plan Priority Habitat. In addition,the Woodland Trust has recently supportedan applicationforthe donation of over 100 indigenous trees specifically recommended forthis area. There are many natural springs on the hillsides above Black Brook which run down through sites LP0026, LP0952, and LP1625, and site LP0177 (a high-risk flood area) is partly situated on a natural flood plain. Anydevelopment on these sites, which act as a natural and essential soak away, would add to the run-off of rain and spring waterandwould exacerbate potential flood damage further down the valley, into West Vale and beyond. The impact of Storms Ciara and Dennis over the week of 9 th -16 th February 2020 should provide a salutary reminder to Council planners of the danger of continuing housing development on flood plains and associated drainage slopes. To comply with current legislation on flooding these sites should be removed from the plan. Large open spaces are needed for the mental and physical health and well being of all. Urban sprawl has many negative consequences for residents and the environment. The wooded valley walkway along the side of Black Brook provides a popular area for many of the local residents to enjoy leisure activities (walking, running, cycling etc.) away from the rigors of everyday life and free from traffic and air and noise pollution, yet within walking distance of existing communities. This is an invaluable asset to the community and must be safeguarded from any future development.

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

Duty to Co-operate Reason:

Please read this section of the Consultation Portal in conjunction with the comments I have made in the other two sections as many comments are relevant to all sections available on the Consultation Portal. I have significant concerns about the way in which the process of producing the Local Plan has been conducted. I believe that Calderdale Council should have made more of an effort to communicate the process of the Local Plan to residents and raise awareness of the consultation. I also think that Calderdale Council have produced a website which is not fit for purpose.It isa far too difficult and time-consuming

process for people to respond to the proposals online, a point which may significantly reduce the number of objections and comments about the plan.

Suggested Modifications:

That the 4 sites in Greetland (LP0026, LP0177, LP0952, and LP1625) be removed from the plan.

Comments:

Additional Evidence Link:

Comment ID **HRU587**

Site ref (if applicable): **LP1625**

Person ID: **1128407**

Name: **Mrs Patricia Sinclair**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Please read this section of the Consultation Portal in conjunction with the comments I have made in the other two sections as many comments are relevant to all sections available on the Consultation Portal. Also note that these comments apply equally across applications LP0026, LP0177, LP0952 and LP1625, as taken together they represent a clear and present danger to the health and vitality of the West Vale/Greetland community. The Local Plan does not address the implications of the National Planning Policy Framework, especially, NPPF Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. Site assessments for the 4 proposed development sites in Greetland are overwhelmingly uncertain or negative: LP0026 ; 10 Uncertain Assessments and 1 Negative Assessments. LP0177 ; 9 Uncertain Assessments and 4 Negative Assessments. This site was also refused planning permission in July 2019. LP0952 ; 11 Uncertain Assessments and 2 Negative Assessments LP1625 ; No sustainability assessments! It is inconceivable that given the above, development should be permitted and even more unbelievable that local councillors should support the adoption of the plan! According to the NPPF Para 143 under 'Proposals affecting the Green Belt' it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' Those very special circumstances simply do not exist and all other more appropriate sites should be included in the Plan before Green Belt sites such as this one. There are no justifiable exceptional circumstances for change of use of this area of Greenbelt land. Although Calderdale Council do recognize some (but by no means all) elements harmful to the Green Belt in their plan, they offer only feeble mitigation against that harm. Calderdale Council need to demonstrate that the Local Plan will enhance those areas where development is proposed and that the development will not negatively affect the existing local communities and the environment in which they live. They have singularly failed to do this. I feel that these plans have not been properly considered and I strongly believe that they will negatively impact upon the environment and the quality of life in the community for years to come.

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

Sound Reason:

Please read this section of the Consultation Portal in conjunction with the comments I have made in the other two sections as many comments are relevant to all sections available on the Consultation Portal. Calderdale Council is basing its estimate of the future need for houses on out-dated information. As we are

no longer members of the EU it should revisit those estimates. It is clearly uncertain that the overall requirement for housing will be as great as stated. In reference to this site reference number, LP1625, and sites LP0177, LP0026, and LP0952, there are a number of issues which apply as a result of the scale of proposed development in the Greetland area. There is a grossly disproportionate emphasis that the Plan has upon some communities, particularly Greetland, which are accommodating far in excess of a fair, reasonable and balanced share of development given their relative size. The resulting 'Urban Sprawl' that this plan would create in the Greetland area will have many negative consequences for residents and the environment, such as increased water, air and noise pollution, increased traffic fatalities and congestion, and increased car dependency. The traffic congestion issues, already evident on Saddleworth Road and Stainland Road, do not appear to get any significant recognition in the plan. West Vale is currently at breaking point with the amount of traffic which passes through on a daily basis. West Vale is a vital access route for the valley and surrounding towns and villages and with additional vehicles, a natural bi-product of development, would become dangerously congested. There is no obvious solution to ease the pressures of traffic on West Vale and despite attempts in process of improving the A629 junction, Saddleworth Road and Rochdale Road junctions, it is highly likely that a possible additional 1200 vehicle movements (assuming a 2 car family per household) at peak periods will result in increased congestion and attendant pollution in West vale and surrounding roads. It has also not escaped notice that the proposed modifications to the A629 will result in an additional junction for commuters from West Vale into Halifax to navigate, potentially resulting in even further congestion back into West Vale. WSP Parsons Brinckerhoff Report on Transport Network states that: "£ This report identifies that traffic congestion at the junction of Stainland Road-Saddleworth Road would increase by approximately 105% "£ This report also identifies that traffic congestion at the juncture of Stainland Road-Rochdale Road would increase by over 100% The potential increase in car journeys in the area will undoubtedly contribute to increased air pollution, particularly effecting vulnerable young children walking to and attending the local school at the side of Saddleworth Road. The existing infrastructure barely meets the needs of the current population of Greetland so increased capacity of schools, dentists, and GP surgeries would be needed to service such a significant increase in the local population. There appear to be no mitigating factors to compensate for the increase of 600 properties in the area. At an average of 4.4 people per property, the population increase of 2640 represents a 25% increase in the potential number of patients eligible for treatment in the local Medical Centre, a service which struggles to cope today. The development of these sites would be against all five functions of Green Belt and, most decisively, would mean the coalescence of Greetland and West Vale and the deterioration of the identity of both places, thus undermining the Council's Settlement Hierarchy. This area of Greetland has an abundance of wildlife due to the natural and undisturbed environment. The valley is home to an extremely healthy and diverse fauna, including heron, kingfishers, dippers, nut hatches, kestrels, owls, pheasant, woodpecker, bats, fox and deer with trout in the brook itself. Development along the riparian habitat would have a severe impact on a number of species who are reliant upon the Eco system which currently exists here. There are also ecological constraints with regards to Black Brook as it is a UK Biodiversity Action Plan Priority Habitat. In addition, the Woodland Trust has recently supported an application for the donation of over 100 indigenous trees specifically recommended for this area. There are many natural springs on the hillsides above Black Brook which run down through sites LP0026, LP0952, and LP1625, and site LP0177 (a high-risk flood area) is partly situated on a natural flood plain. Any development on these sites, which act as a natural and essential soak away, would add to the run-off of rain and spring water and would exacerbate potential flood damage further down the valley, into West Vale and beyond. The impact of Storms Ciara and Dennis over the week of 9<sup>th</sup> -16<sup>th</sup> February 2020 should provide a salutary reminder to Council planners of the danger of continuing housing development on flood plains and associated drainage slopes. To comply with current legislation on flooding these sites should be removed from the plan. Large open spaces are needed for the mental and physical health and well being of all. Urban sprawl has many negative consequences for residents and the environment. The wooded valley walkway along the side of Black Brook provides a popular area for many of the local residents to enjoy leisure activities (walking, running, cycling etc.) away from the rigors of



everyday life and free from traffic and air and noise pollution, yet within walking distance of existing communities. This is an invaluable asset to the community and must be safeguarded from any future development.

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

Duty to Co-operate Reason:

Please read this section of the Consultation Portal in conjunction with the comments I have made in the other two sections as many comments are relevant to all sections available on the Consultation Portal. I have significant concerns about the way in which the process of producing the Local Plan has been conducted. I believe that Calderdale Council should have made more of an effort to communicate the process of the Local Plan to residents and raise awareness of the consultation. I also think that Calderdale Council have produced a website which is not fit for purpose. It is far too difficult and time-consuming process for people to respond to the proposals online, a point which may significantly reduce the number of objections and comments about the plan.

Suggested Modifications:

That the 4 sites in Greetland (LP0026, LP0177, LP0952, and LP1625) be removed from the plan.

Comments:

Additional Evidence Link:

Comment ID **HRU600**

Site ref (if applicable): **LP1625**

Person ID: **1243001**

Name: **MR David Farrar**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

See comments below.

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

Sound Reason:

I object to the Local Plan Site Ref LP0177, LP0952, LP1625, LP0026 for the following reasons: Loss of highly Sensitive Green Belt Increased Traffic Congestion Increased Air pollution Increased Flooding to sewers and rivers Loss of -"Highly Sensitive Green Belt" NPPF Section 13 Protecting Green Belt Land Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: 1) to check the unrestricted sprawl of large built-up areas (2) to prevent neighbouring towns merging into one another (3) to assist in safeguarding the countryside from encroachment (4) to preserve the setting and special character of historic towns (5) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Calderdale Council, in its own evidence, concludes that this area of Green Belt performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt. Esther McVey's (former Housing Minister up to Nov 2019) written policy on Green Belt land quotes: "protecting the Green Belt goes beyond protection against development" - "My department is working with DEFRA

(Department of Environment, Food & Rural Affairs) and Natural England on the once-in-a-generation Environment Bill which will establish a comprehensive legal framework for environmental improvement and make net gains for biodiversity mandatory for new development. Of course one of the most important environmental safeguards we have is the Green Belt. And I want to be clear that our commitment to this is as strong as ever, with any changes only happening in exceptional circumstances ; protecting the Green Belt goes beyond protection against development"

Exceptional circumstances in The Government White Paper - "Fixing our Broken Housing Market"

Parag 1.39 states that: - "The Government wants to retain the high bar to ensure the Green Belt remains protected, but we also wish to be transparent about what this means in practice so that local communities can hold their councils to account therefore we propose to amend and add to the National Policy to make it clear that: authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including making effective use of suitable brownfield sites and the opportunities offered by state regeneration :

Do Calderdale Council have the evidence that they have done this? Brownfield sites have been removed from the plan because developers do not want to develop these sites as there profits are not as high. This is not a good reason for destroying highly sensitive green belt and does not constitute exceptional circumstances. There are brownfield sites within Calderdale that could be developed to provide the necessary housing demand and should be developed first before destroying green belt for ever.

Changes to Economic Relationships

The Local Plan was drawn up between 2016 and 2018, with amendments made in October 2019. The plan was based on housing requirement to support the economic growth plan. This country has just seen its biggest change in 47 year as we have now left the EU. The housing projection used in the Local Plan must no longer be valid due to the significant change in UKs relationship with the EU. Reduced immigration will lead to a reduction in the amount of new housing required and therefore reduce the need to release Green Belt. It must be reviewed prior to acceptance of the plan as the housing need will be significantly smaller post Brexit.

Increased Traffic Congestion

Saddleworth Road\Stainland Road Junction. The 4 sites proposed on Saddleworth Road will more than double the number of vehicles coming down Saddleworth Road. There has been chronic congestion at the 2 traffic light junctions in nearby West Vale for a number of years now. This crossroad junction carries traffic from Greetland, Barkisland and Ripponden, traffic to and from Elland and Junction 24 of the M62, and all traffic travelling between Halifax and the villages beyond the Outlane area of Huddersfield and Junction 23 of the M62. This junction is dangerous and congested throughout the day, especially since a Cooperative store was sited in the middle of the Saddleworth Road/Stainland Road traffic light junction about 4 years ago. Vehicles including buses and trucks fight over the space at both junctions in West Vale and often selfishly push their way through when the lights are red, in turn putting other road users and pedestrians at risk of harm. The flow of slow moving vehicles is constant and air pollution here has increased as a consequence. It has been stated that this can be resolved by changing the setting on the traffic lights, but this cannot ease the congestion if additional capacity is not provided on the roads out of the junction towards Elland or Halifax. The multimillion pound works at Salterhebble will only make the congestion worse in West Vale as it makes the queueing area between Salterhebble mini roundabout and West Vale smaller, therefore the traffic will back up into the West Vale traffic lights area making the situation worse. The local roads are incapable of taking any additional traffic. Calderdale Council are proposing to allow 600 plus properties to be built on Saddleworth Road thus adding to the chronic issues which already exist.

Increased Air Pollution

The primary goal of the Clean Air Act is, - "to achieve national ambient air quality levels protective of public health and welfare by establishing air quality standards and imposing limitations on air pollutant emissions from both stationary and mobile sources"

The doubling of the number of vehicles (due to the proposed housing developments) using and sitting in traffic queues on the lower part of Saddleworth Road will impact negatively on the air quality in the area. There is an infant school and pre school located between 2 of the proposed large housing sites on Saddleworth Road. Traffic around the school is already a major safety issue and the road around the school is a bottleneck twice a day. Increased emissions from the standing traffic will affect the children and families using the school and those living near the school. Air quality standards will be compromised. The centre of West Vale probably

has poor air quality already. Let's not add to it for the sake of our health. Clean air is crucial for our health and well being, and Greetland is a community continually trying to create a better and healthier environment for the benefit of everyone. Money has been obtained from the Woodland Trust and a large number of trees have already been planted in the area and more are planned. This is being undertaken in order to maintain good air quality and to help preserve the habitat for the wildlife corridor here. Massive house building in the area will negate these actions. Flooding Immediate Area On the last Local Plan these sites were graded as a Class 1 Severe Risk Flood Area and were removed; in compliance with current legislation they should not have been put back into the amended Local Plan in October 2019. The area to the rear of Woodfield Drive next to the brook, part of the development site LP0177, flooded very badly on Boxing Day 2015 and again 8th/9th February 2020 and again 14th/15th February . Residents have already posted images of the flooding in this Portal for reference. The current planned development in along Saddleworth Road will increase greatly the peak flows and volumes runoff from the fields and therefore the risk of flooding. Developers use Sustainable Urban Drainage techniques to slow this flow down, but the clay soil in this area make this technique unsuitable. The alternative is large storage areas either above or below ground. These techniques will reduce peak flows and slow the flows down but they do not reduced the volume of runoff that will be more than double the greenfield runoff, thus making the flooding to the rivers worse in the immediate vicinity and West Vale. Current policy and legislation on flooding states "due to every increasing wide-scale flooding incidents in the country and the ever increasing threat of climate change new development in a flood area that increases the risk of flooding in the development's community or elsewhere is not permitted". Calderdale Council Planning Department has a duty of care to comply with current policy and legislation on flooding. Housing should not be built on sites such as this. Wider Catchment Issues The Black Brook flows through West Vale and discharges into the river Calder in Elland. In 2015 and 2020 major flooding has occurred on the River Calder at Todmorden, Hebden Bridge, Mytholmroyd, Sowerby Bridge, West Vale, Elland and Brighouse. The proposed development along Saddleworth Road as stated above will double the volume of water into the black brook further increasing the risk of flooding at very sensitive flood site downstream in Elland and Brighouse. If the land is no longer needed for farming, it would be better used to contribute to reducing the wider catchment flooding issues by planting trees which will reduce runoff and also enhance the wildlife corridor. Sewer Flooding The sewers that runs close in the Black Brook and down Saddleworth Road are already overloaded with combined sewer overflows (CSO) that discharge excess flows into the brook at time of rainfall. The proposed developments will more than double the number of houses connected to these sewer systems. These additional foul flows will almost double the flood volumes on the sewers and and nearly double the annual spill volumes from the CSOs which will increase the pollution to the brook. This will have a negative impact on the fish and wildlife in the area. The Environment Agency have a no deterioration policy for CSOs but there are currently no plans to upgrade the sewer system in Greetland and West Vale to negate this impact.

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

Duty to Co-operate Reason:

There are significant concerns about the way in which the Local Plan has been formulated and worries too about the involvement and influence of major developers on the selection of suitable sites. I feel that Calderdale Council should have made a better effort to communicate the process of the Local Plan to residents and done more to raise awareness of the consultation. I also think that Calderdale Council's website is a maze of screens, reports, and links, that are very difficult to navigate through and to fully understand. Their user guidelines are minimal and provide no real help in getting you to the right place to make a comment. It is a far too difficult and time consuming process for people to respond to the proposals online, a point which may significantly reduce the number of objections and comments about the plan.

Suggested Modifications:

That the 4 sites in the Greetland area (LP0026, LP0952, LP0177, and LP1625) be removed from the plan.

Comments:

Additional Evidence Link:

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Comment ID **HRU607**

Site ref (if applicable): **LP1625**

Person ID: **1243009**

Name: **Mr Martin Worsick**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

This plot is shown as being Green Belt land and readily meets 3 of the 5 main criteria for Green Belt land. In the site assessment report it is identified as Greenfield. This land has been Green Belt land for some time now and as such building restrictions apply. This plot is a flood plain area and has indeed been severely flooded within the last week. Government guidelines NPPF suggest that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas of higher risk whether existing or future.

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

Sound Reason:

Green open spaces are very important to our health and well being and we have chosen to live in a rural area exactly for those reasons. Urban sprawl is in danger of encroaching on our local green spaces and removing precious green belt land and corridors which host a wide variety of flora and fauna. We have seen deer, pheasants, owls, bats, and a wide variety of birds. Black Brook has brown trout and possibly even otters. In Calderdale's own Sustainability Appraisal in 2018 the sites were recognised as being grade 3 agricultural land and as being a valuable commodity for the future especially due to climate change. As mentioned above there is a serious risk of flooding which would only be exacerbated by any housing built on the fields identified in sites LP0026, LP0177, LP1625, and LP0952 which would remove valuable soak away areas. There is a grade 2 listed farm house building yards to the south of this site. Site LP0177 has recently been refused planning permission (5th July 2019). Again looking at the 4 proposed sites mentioned above, and the high number of proposed houses (600) at the side of Saddleworth Road there would be a massively significant increase in traffic on this road leading to even more issues at the already congested junctions of Saddleworth Road and Stainland Road and Stainland Road and Rochdale Road in West Vale. The early morning and school time traffic queues stack back almost to the school on Saddleworth Road at the moment so additional traffic would undoubtedly increase air and noise pollution particularly in the area around the school where especially vulnerable young children walk to school. Rat runs may also be created between the main arterial routes as drivers seek to avoid the worst congestion. The local infrastructure is already stretched with schools, doctors, and dentists in the area struggling to meet the needs of the local community. This is an area with a high car ownership and public transport in the area is poor and infrequent with only limited services to serve the community.

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

Duty to Co-operate Reason:

Calderdale Council have not done enough to communicate this plan, and the method and deadlines for commenting on the plan. They have obviously tried to limit the number of people objecting to the plan. The website provided for making comments and objections is over complicated and very very difficult to access and navigate and the guidance notes are insufficient for all but the most computer literate. There are significant concerns about the way in which the Local Plan has been formulated and worries too about the involvement and influence of major developers on the selection of suitable sites.

Suggested Modifications:

This plot should be taken out of the plan.

Comments:

Additional Evidence Link:

Comment ID **HRU611**

Site ref (if applicable): **LP1625**

Person ID: **1242514**

Name: **MRS Christine Beaumont**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I would like to object to the proposed local plan for Greetland. First of all point out that Greetland is in Halifax and not Elland (my address Greetland, Halifax, West Yorkshire NOT Greetland, Elland, Calderdale). I have been a resident in the village of Greetland for over 35 years. Within these years I have seen several housing developments built. First of all the Goldfield Estate. A very large housing development. This was built on an area of green space and took away a play area for children and recreational use for adults. It also took away a natural habitat for wildlife. The 2nd estate to be built was the Bankfield Estate. Again another large estate. Which took away a play and recreational area and also wildlife habitat. One of those being a very large pond fed by local springs where newts, frogs and dragon flies could be found. It was a regular place for families to visit. In addition to these there have been several smaller developments. The developments over the last 35 years has resulted in the village doubling in size. The school, which only had one class per year when my own children attended, now has 2 classes per school year. I understand the capacity of the school is 420 and the school is FULL. Objection Flooding - 2015 & 2020 The Greenbelt land proposed for building is prone to flooding. In 2015 there was significant flooding to the fields in question. Prior to this date there were defined paths from West Vale, along Black Brook, to Gate Head Lane. After the floods these disappeared. The ground fractured in some of the areas. The water was contained by these fields. As far as I am aware, there wasn't any damage to properties in the surrounding area. However, further down the valley, towards Elland, buildings, a bridge and other properties sustained significant damage. The bridge collapsed. Where is the water to go if the fields are built on? Will the properties in lower Greetland/West Vale be the next area to experience flooding? Are they going to suffer in the same way as those in Hebden Bridge? Since writing this, there has been further significant flooding to the area. On 8th and 9th February 2020 the land on all of the local plans for Greetland was flooded. Several images/videos can be found on the Greetland Pressure Group facebook page. In addition to these areas significant flooding occurred on Stainland Road, the fields off Stainland Road, Elland, Brighouse and the Calder Valley. Stainland Road travels through West Vale (lower Greetland). Infrastructure - Education, Health, Highways. Highways If the building work was allowed to be carried out there would be noise, dust,

mud. Constant and increased traffic on both Saddleworth Road and Rochdale Road. Vehicles (trying to avoid building contractors and queues on Saddleworth Road) taking the narrow roads up to Rochdale Road to enable them to take that road into West Vale. The roads in this area cannot cope with any increase in traffic. A journey down to West Vale (on both roads) at peak time in a morning can take up to 25 minutes at the moment. This journey time will increase considerably if the number of dwellings proposed were to be allowed. As a result of standing traffic there would be a significant increase in air pollution. It is obvious even now when you walk down the hill from Greetland to West Vale. Air pollution is particularly bad in West Vale at peak times. This is only going to get worse with the extra vehicles both from the new estates and the building contractors. Saddleworth Road or Rochdale Road have to be taken if you intend to travel in the direction of Halifax or Huddersfield or join the M62. There is no alternative. All roads lead to West Vale and no recalibration of the traffic light timing sequence at the junctions will ease the present congestion or future increased traffic. The routes our children take to walk between their respective schools are the same ones that will attract the increased traffic and resultant air pollution. What effect will this air pollution have on our community's health? The effect this would have on our children (and adults) would be catastrophic. (increase in respiratory problems?) This is an area where, at the moment, you can still leave your car at home and walk. Surely the health of our community should be our priority. Don't take our countryside away. We need it. Our future generations need it!

**Infrastructure - Schools** The Greetland School is sited on Saddleworth Road and School Street (off Rochdale Road). Greetland School is run over 2 sites. Years 1 & 2 at the Sunnybank Annex. The Sunnybank Annex and pre-school, are in the area where one the largest of the proposed dwellings on the local plan are to be built (LP0177 - 200 houses). The construction of this development, and the others higher up Saddleworth Road, will result in increased air pollution, noise, dirt etc which can only have a detrimental effect on everyone's health. The previous developments resulted in the local schools having to significantly increase class sizes and the number of classes. As the schools are at capacity now, how are they expected to accommodate the children of new families to the area? What effect will it have on existing families being able to get their children into their local school? There would be an increase in traffic at school drop off and pick up times. This is already an issue. Any increase in traffic would only serve to put lives at risk. For a child, walking to school is part of growing up. It is a way of socialising, exercising, learning to deal with traffic, gaining independence etc. Let's make it safe.

**Infrastructure - Health** Additional housing in the area would need our local GP surgeries and dental practices to be expanded. Already there is a shortage of doctors and NHS dentists and this has been the case for some time. This is not going to change. These services are a necessity of life and therefore the lack of them cannot be ignored. This week we have seen the closure of 5 surgeries in Calderdale and patients placed with other, existing, GP surgeries. This extra burden on GP'S cannot continue. We will end up losing General Practice Doctors not attracting them to the area. Extract from the Halifax Courier 21.1.2020. "The Sowerby Bridge, Ovenden and Elland, sites currently operated by Virgin Care LLP (Meadow Dale Group Practice) will close and the CCG will register patients with an alternative practice". Children (and adults) need exercise. Need to be outside in the fresh air. Need to socialise outside of the home. Extract from the minutes taken at the meeting of the Calderdale Health and Wellbeing Board dated 8th August 2019. "There were a number of recent examples of work within the community which had provided benefits for residents of Calderdale. Examples were provided by Officers in regards to 'harnessing the power of communities', one which involved a walk in the hills with young people, who experienced a different kind of engagement to get away from the notion of the same kinds of activity relating to exercise (e.g. gym, swimming etc.), which positively impacted their health as well as their mental health and emotional wellbeing". How can Calderdale, and the Government agencies, propose building on Greenbelt land and removing what they obviously see as a benefit to their communities health, mental health and emotional wellbeing. Extract from News Centre - Latest News from Calderdale Council(<http://news.calderdale.gov.uk/helping-young-children-to-stay-active>) Posted 27.9.2019. Gemma Mann, Children's Health and Wellbeing Lead at Public Health England, said: -"It's really important that all children get the necessary daily physical activity they need to stay healthy, the benefits for children are well evidenced. Moving more helps young children to develop motor skills, improves cognitive

development, helps them maintain a healthy weight, enhances bone and muscular development and supports the learning of social skills." Cllr Faisal Shoukat, Calderdale Council's Cabinet Member for Public Health and Cohesion, said: -"We want all children in Calderdale to have the best start in life. An important part of this is to be physically active from an early age". Don't take our countryside away. We need it. Our future generations need it! Ecology I have reviewed the comments made by Mr Mark Jones of David Wilson Homes. Please explain how reducing a 10HA area of naturally occurring greenbelt/wildlife corridor down to 3.38HA of man-made wildlife corridor can produce "an enhanced biodiversity/recreation corridor". Surely, the greenbelt land as it is, currently sustains a greater and more diverse naturally occurring ecological system than any man-made corridor could ever create. I've also noted Mr Jones comments on the expansion of the school. Another building contract for them! Once again, the big contractors, government and local councils, are attempting to take away school playing fields. Consequently the loss of Physical Education facilities and recreational spaces can only result in even more unhealthy children. How does that sit with "The Council's health and anti-obesity campaign?". I would also question whether Mr Mark Jones ever visited the area in compiling his report. I would also refer to the Housing Minister Esther McVey's speech on the updated National Planning Policy Framework: setting out the government's planning policies for England and how they should be applied. (16.10.2019 published 16.1.2020). "Protecting the environment for future generations" "The revised NPPF also takes a long view; recognising the role that smart planning and good design plays to not just protect, but enhance, our environment and tackle climate change. As such, it asks local authorities to seek net gains for biodiversity when granting planning permissions. It encourages the provision of green infrastructure, recognises the important status of Local Wildlife Sites, ancient and veteran trees and woodland and prevents unacceptable development in National Parks and Areas of Outstanding National Beauty. But we know we have to do more. Which is why my department is working with Defra (Department for Environment, Food & Rural Affairs) and Natural England on the once-in-a-generation Environment Bill which will establish a comprehensive legal framework for environmental improvement and make net gains for biodiversity mandatory for new development. Of course, one of the important environmental safeguards we have is the Green Belt. And I want to be clear that our commitment to this is as strong as ever, with any changes only happening in exceptional circumstances - and, even then, development only being able to go ahead with improvements to access and environmental quality in the remaining Green Belt. Protecting the Green Belt goes beyond protection against development" There is no improvement to access or environmental quality in the remaining Greenbelt. By proceeding with the developments proposed for the Greetland area you are removing a substantial amount of our Greenbelt. As such you are failing to comply with the government ministers instructions. Extract from the Independent 5.12.2019 17.08 pm <https://www.independent.co.uk/news/uk/politics/boris-johnson-housing-build-construction-flood-plains-derbyshire-election-a9234456.html> Boris Johnson has thrown housebuilding plans into confusion, by suddenly calling for an end to construction on flood plains. Around 9 per cent of new homes in England are built on land where there is a -"high probability" of flooding "" and a recent investigation found that 10,000 are currently in the pipeline. But, on the campaign trail in flood-hit Derbyshire, the prime minister said: -"We've got to stop building on flood plains. We've got to stop building on areas which are vulnerable to flooding." And we now turn to Calderdale Authority. The following link is to a survey sent out by Calderdale Council to the local community. The survey was received on Thursday 6th February, 2020, just before the extensive flooding that occurred on 8th and 9th February 2020. This survey refers to the Climate Emergency. <https://www.calderdale.gov.uk/survey/climate-emergency-2020/?id=fmB2n> Extracts from the survey: " Pollution from fossil fuel vehicles causes asthma in our towns, and worsens the health of those with heart or lung problems. Traffic noise is a nuisance for many communities, and fast moving vehicles pose dangers - especially for children. Many people sit down in their car to drive to work and then spend all day sat in an office. This physical inactivity is bad for our health". Land and Biodiversity "Biodiversity is at severe threat from climate change such as a loss of species and habitats. Land use may need to change drastically in the future to meet climate change targets before the damaging effects are irreversible. Going back in history, much of the UK's land mass was covered in trees. There were also huge

areas of bog and marsh. People used the trees as a natural resource as a fuel and to build ships. Bogs and marshes were drained for food production. From a climate change perspective Calderdale alongside the rest of the South Pennine landscape was subjected to 200 years of the worst atmospheric pollution the UK has ever seen from past industrial activity. This has decimated the uplands of Calderdale to a carbon source from degraded peatland, with poor fire resilience, declining biodiversity and reacting rapidly to flooding. It is possible to turn this around, restoring the blanket bog to a condition which is a real benefit to all of us. The uplands of Calderdale also have a lower than average tree cover following historic land management practices. People who live in Calderdale today are very used to seeing fields and open spaces, grazing animals and pastures - land which has been designed by and is managed for the benefit of humans. Declining bee populations have become a well understood symbol of the impact of intensive agriculture. Additionally, a whole host of birds, insects and other animal populations have declined and species are at risk of becoming extinct. We could change how we use land to plant more trees, restore upland bog habits and give more space to wildlife. Our landscape would start to act as a carbon sink as plants thrived. Wild spaces could attract tourists and leisure visitors. Our future landscape could look quite different. Are we willing to see changes made?" There would appear to be some discrepancy in what the Prime Minister, Government Ministers and local authorities are saying regarding the protection of our greenbelts, communities and health. Based on what all these departments have said - house building should be stopped! We should be looking after our communities. We should be protecting our "Green and Pleasant Land" .

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

Sound Reason:

See above comments.

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

Duty to Co-operate Reason:

See above comments

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU627**

Site ref (if applicable): **LP1625**

Person ID: **1243017**

Name: **Mrs Jowett**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Please refer to the attached document.

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



Sound Reason:

Please refer to the attached document. There are a number of issues with the proposed plan which are also applicable to (LP0177, LP0952, and LP1625) in the Greetland area. In addition, it is important to consider how strongly the local community feels about the proposed development to the highly sensitive greenbelt area. You only have to look at the >600 members of the local pressure group which has received press coverage as well as regional television attention to evidence this. The group are extensively lobbying to demonstrate how opposed the local community are to the proposal which looks to have a devastating impact on the local area.

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

Duty to Co-operate Reason:

Please refer to the attached document.

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5606079>

Comment ID **HRU629**

Site ref (if applicable): **LP1625**

Person ID: **1243019**

Name: **Mrs Sally Farrar**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

See comments below

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

Sound Reason:

OBJECTIONS TO SITES LP0026, LP0177, LP0952, LP1625 SITES IN GREETLAND The revision of Calderdale's local plan now includes a massive number of houses across 4 sites in Greetland, within a 0.8mile stretch of a busy B road. All of which is Green Belt. I just don't get it? How can any councillor, cabinet member, planning officer or local government officer even consider the destruction of green belt and open spaces in this area. This is not sustainable and will destroy this area for good, The impact of this for our nature and for our community will be catastrophic. Greetland is a small, historic village on a hillside, surrounded by playing fields, open grazing land and moorland at the top, and by open grazing fields, woodlands, a small river and a long existing wildlife corridor in the valley bottom. The hillside is criss- crossed with ancient public footpaths, and an old, well worn public footpath runs through our wildlife corridor in the valley bottom, travelling the whole length of the proposed local plan site. Green and open spaces around us keep us sane and healthy. We love living here and we use our open green spaces each and every day for fresh air, for walking and exercise, and to engage with the natural environment which is on our doorstep. Mass housing development across these sites will have adverse effects immediately and for future generations. The natural habitats of the wild deer, foxes, bats, owls, herons, field mice and squirrels will be destroyed or changed forever due to noise and light pollution, general disturbance, and by upsetting the natural balance

of these areas. Our wildlife will disappear and our youngsters will not experience the sounds of the owls hooting in the night nor see the bats flying about at dusk. One day they will just have to research these things on the internet. How sad is that? Without green and open areas in our community, people will have little option but to jump into their cars and drive somewhere else in order to enjoy natural open spaces and learn about nature and wildlife. Car fumes then causing further damage to the environment. That does not make any sense nor it is sustainable. Changing economy following Brexit The Local Plan was drawn up between 2016 and 2018, with amendments made in October 2019. The plan was based on housing requirement to support the economic growth plan. This country has just seen its biggest change in 47 year as we have now left the EU. The Local plan is now out of date and should be reviewed as housing need will be significantly smaller post Brexit. Reduced immigration will lead to a reduction in the amount of new housing required and therefore reduce the need to release Green Belt. A few small businesses and light industries exist in this area but there are no large employers locally and there are no new sites identified for planned local employment. This will mean that people moving into Greetland will have to travel out of the area for job opportunities, Loss of green belt and wildlife corridor According to the Local Plan, all of this land is classified as -"highly sensitive green belt" We need to protect it not lose it. NPPF Section 13 Protecting Green Belt Land Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: 1) to check the unrestricted sprawl of large built-up areas (2) to prevent neighbouring towns merging into one another (3) to assist in safeguarding the countryside from encroachment (4) to preserve the setting and special character of historic towns (5) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Calderdale Council, in its own evidence, concludes that this area of Green Belt performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt but, most decisively, would see the coalescence of Greetland and West Vale and the deterioration of the identity of both places undermining the Council's Settlement Hierarchy. Notwithstanding this, extreme number of housing proposed in and around the site is undeliverable during a single plan period in plan-making terms and unsustainable in infrastructure terms in relation to the capacity of existing highways, schools and local services. Esther McVey's (former Housing Minister up to Nov 2019) written policy on Green Belt land quotes: "protecting the Green Belt goes beyond protection against development" "My department is working with DEFRA (Department of Environment, Food & Rural Affairs) and Natural England on the once-in-a-generation Environment Bill which will establish a comprehensive legal framework for environmental improvement and make net gains for biodiversity mandatory for new development. Of course one of the most important environmental safeguards we have is the Green Belt. And I want to be clear that our commitment to this is as strong as ever, with any changes only happening in exceptional circumstances ; protecting the Green Belt goes beyond protection against development" Exceptional circumstances in The Government White Paper -"Fixing our Broken Housing Market" Paragraph 1.39 states that: -"The Government wants to retain the high bar to ensure the Green Belt remains protected, but we also wish to be transparent about what this means in practice so that local communities can hold their councils to account therefore we propose to amend and add to the National Policy to make it clear that: authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including making effective use of suitable brownfield sites and the opportunities offered by state regeneration : Do Calderdale Council have the evidence that they have done this? CPRE also state "The development of brown fields sites should be a priority; there are more than enough brown field sites to fulfil the requirement without having to encroach onto Green Belt". There are plenty of brownfield sites in Calderdale that would enhance the area by development and these are the sites Calderdale Council Planning Department should be targetting, thus complying with the current legislation and Central Government policy. Calderdale Council Planning Dept has stated several times that developers are not interested in brownfield sites . This is against Government Policy and does not constitute exceptional circumstances . Accordingly, this site in the existing Green Belt should be removed from the Plan as the exceptional circumstances for its release do not exist. Increased Traffic and congestion

on Saddleworth Road, particularly at the traffic lights junction with Stainland Road There has been chronic congestion at the 2 traffic light junctions in nearby West Vale for a number of years now. This crossroad junction carries traffic from Greetland, Barkisland and Ripponden, traffic to and from Elland and Junction 24 of the M62, and all traffic travelling between Halifax and the villages beyond the Outlane area of Huddersfield and Junction 23 of the M62. This junction is dangerous and congested throughout the day, especially since a Cooperative store was sited in the middle of the Saddleworth Road/Stainland Road traffic light junction about 4 years ago. Vehicles including buses and trucks fight over the space at both junctions in West Vale and often selfishly push their way through when the lights are red, in turn putting other road users and pedestrians at risk of harm. The flow of slow moving vehicles is constant and air pollution here has increased as a consequence. The local roads are incapable of taking any additional traffic. Calderdale Council are proposing to allow 600 plus properties to be built on Saddleworth Road thus adding to the chronic issues which already exist. The WSP Brinkerhoff Report of May 2017 has indicated that traffic will increase by over 107% if the proposed housing developments were to go ahead. Calderdale have suggested that one solution here will be to alter the traffic lights, presumably to allow more traffic off Saddleworth Road, but this does not make any sense as the all of the other traffic using the junction will back up further. This is a ridiculous -"solution" to the problem and is not feasible nor sustainable. Calderdale Council plan to manage traffic in the area by creating a new junction on the A629 for traffic travelling between the Elland bypass and Sowerby Bridge. Additional traffic lights here will only cause the traffic coming from West Vale to back up, especially as there is a low railway bridge for high sided vehicles to negotiate. This is not a viable nor sustainable solution. Increased air pollution What about Clean Air for all ? The primary goal of the Clean Air Act is, I quote -"to achieve national ambient air quality levels protective of public health and welfare by establishing air quality standards and imposing limitations on air pollutant emissions from both stationary and mobile sources" A huge increase to the number of vehicles (due to the proposed housing developments) using and sitting in traffic queues on the lower part of Saddleworth Road will impact negatively on the air quality in the area. There is an infant school and pre school located between 2 of the proposed large housing sites on Saddleworth Road. Traffic around the school is already a major safety issue and the road around the school is a bottleneck twice a day. Increased emissions from the standing traffic will affect the children and families using the school and those living near the school. Air quality standards will be compromised. The centre of West Vale probably has poor air quality already. Let's not add to it for the sake of our health. Calderdale Local Authority is already in the top quarter of deprived authorities so the quality of our living space is crucial. We all need to realise the cost of air pollution. Traffic is the biggest air pollutant. Poor air quality where we live impacts on health and care costs, due to increasing incidents of disease, lung problems and cancers. Clean air is crucial for our health and well-being, and Greetland is a community continually trying to create a better and healthier environment for the benefit of everyone. Money has been obtained from the Woodland Trust for a large number of trees to be planted in the area. This is being undertaken in order to maintain good air quality and to help preserve the habitat for the wildlife corridor here. Massive house building in the area will negate these actions. Flooding The green belt sites on Saddleworth Road proposed for housing development are flood plains and actually flood when rainfall is particularly high. These sites flooded very badly on Boxing Day 2015 and again as recently as 8th and 9th February 2020 and this weekend 15th February 2020. This has been particularly dreadful for properties situated below Saddleworth Road. Residents have already posted images of the flooding in this Portal for reference. The Black Brook (our small river) collects all of the run off from the hills and fields the length of the Blackburne Valley. Over the years, the path of the Black Brook has altered as the heavy volume of water gouges out new routes for itself downhill in the valley bottom. The fields here are a natural and essential soak off and any building on this land would further increase the flooding in immediate area, and of land, properties and businesses downstream of the Black Brook. Current policy and legislation on flooding states "due to every increasing wide-scale flooding incidents in the country and the ever increasing threat of climate change new development in a flood area that increases the risk of flooding in the development's community or elsewhere is not permitted". Calderdale Council Planning Department has a duty of care to comply with

current policy and legislation on flooding. Housing should not be built on sites such as this. On the last Local Plan these sites were graded as a Class 1 Severe Risk Flood Area (LP0177) and were removed; in compliance with current legislation they should not have been put back into the amended Local Plan in October 2019. Flooding in the valley below Saddleworth Road contributes to flooding in the Calder Valley. The Black Brook flows through West Vale and discharges into the river Calder in Elland. In 2015 and sadly ongoing this week, major flooding has occurred on the River Calder at Todmorden, Hebden Bridge, Mytholmroyd, Sowerby Bridge, West Vale, Elland and Brighouse. The huge number of housing units proposed for Greetland will increase greatly the peak flows and volumes of runoff from the area. Developers use Sustainable Urban Drainage techniques to slow this flow down, but the clay soil in this area make this technique unsuitable. The alternative is large storage areas either above or below ground. These techniques will reduce peak flows and slow down the flows but they do not reduced the volume of runoff which will be more than doubled, and in turn contribute to flooding in West Vale, Elland and Brighouse. Severe flooding continues to be disastrous for local businesses, both small and large, destroy peoples lives and impacts negatively on the local economy. Sewer Flooding The sewers that runs close in the Black Brook and down Saddleworth Road are already overloaded with combined sewer overflows (CSO) that discharge into the brook. The proposed housing will more than double the number of houses connected to these sewer systems. The se additional foul flows will almost double the flood volumes and significantly increase the number of spills and volumes from the CSOs which will increase the pollution to the brook. This will have a negative impact on the fish and wildlife in the area. The Environment Agency have a no deterioration policy for CSOs but there are currently no plans to upgrade the sewer system in Greetland and West Vale to negate this impact. Lack of infrastructure Saddleworth Road is a very busy B road carrying a great deal of traffic up and down the valley, including many heavy stone trucks from the quarries and heavy trucks from Sonoco, the nearby recycling plant, There has been one fatality on this stretch of road in the past 3 years. Allowing large scale house building on Saddleworth Road will be dangerous and cause huge problems not only on this road itself but for the adjoining narrow roads and areas. Calderdale Council do not have any plans in place to improve safety or traffic congestion on Saddleworth Road. They propose that long standing traffic problems in West Vale will improve following the creation of a new junction on the A629 towards Halifax, but I do not see how this can possibly alleviate the problems in the immediate locality of West Vale/Saddleworth Road. A planned station at Elland (no-one seems to know when this is meant to happen) will not alleviate any of this congestion either, as more housing in Greetland will mean more cars travelling through West Vale junction to access the station!. Traffic from the wider area will also have to come through West Vale to access any station. Public transport links remain poor on Saddleworth Road and have not altered in years. There is one bus an hour into Halifax or Elland for shopping and other services and the nearest train station is a car or taxi journey away. Apparently at the Local Plan Meeting it was stated: "We will ensure that there are bus stops near any new developments" I do not see how this will help at all as we do have bus stops already but not much of a bus service! Local primary and senior schools are full. With a proposed 600 plus new houses here, another 200 school place will likely be needed locally. Local GP practices are already under strain. Further strain on local hospitals Local Dentist has a waiting list of 600 for NHS places.

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

Duty to Co-operate Reason:

In 2016 regarding the first Local Plan a petition with 161 signatures objecting to building on our beautiful Green Belt was presented to Calderdale Council Planning Department and 30% of the total objections submitted from the whole of Calderdale residents were from the Greetland area alone. These objections will still be relevant as nothing has changed since that period of consultation but I understand that these comments have just been archived and cannot be brought forward to this amended Local plan consultation. Calderdale Council has not been helpful or open about this new consultation period and have failed to make the residents aware of the need to submit new objections to the amended Local Plan and

the timescales for this. The Council probably hoped that the amended local plan (with the additional sites included for Greetland and Elland), would slip through un-noticed and unchallenged. I do not consider that Calderdale Council have acted in a fair, open, honest and transparent way in regard to the amendments made to the Local Plan

Suggested Modifications:

That the 4 sites in the Greetland area (LP0026, LP0952, LP0177, and LP1625) be removed from the plan.

Comments:

Additional Evidence Link:

Comment ID **HRU654**

Site ref (if applicable): **LP1625**

Person ID: **1243064**

Name: **Mr Martin Cleminson**

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 believe the plan to build hundreds of houses on this site are not sound for a number of reasons. Green belt: The land earmarked for being developed is green belt land. This is supposed to be protected land. There are brown field sites nearby such as the recently demolished mills at West Vale which should be considered instead for development. There are no exceptional reasons to remove the area's Green belt status and it goes against policy to prevent urban sprawl. Wildlife: This land is the home to many species of animals, many of which are protected. These include bats, deer, foxes, herons, owls, and sparrowhawks. There are also many mature trees which should be protected. There are public footpaths across the site and this is a well-used site where people enjoy spending time in the fresh air. Flooding: Areas of the fields on which these new houses are proposed, are part of a flood plain. Since 2015 these fields have flooded completely three times, the latest time being during Storm Ciara in February 2020. The existing volume of water currently causes flooding further downstream, including west Vale Cricket Club, the Bowling Green, and adjacent allotments. The overflowing Black Beck adds to the flooding of Heath Rugby Club and garden centre on Stainland Road. Any additional development will cause further fast flowing run-off from roofs, roads etc., and increase the flooding further, having far-reaching consequences for not only the owners of these future houses, but also the rest of Greetland, West Vale, Elland and as far as Brighouse Air pollution: The development site is in a valley which traps fumes. The proposed developments added together could bring 1000 or more extra cars, and with them, a massive increase in air pollution to the children of Greetland Academy (especially the youngest children, the infants, whose part of the school is located on Saddleworth Road), as well as the toddlers and pre-schoolers at Sunnybank Pre School. Traffic Congestion The existing road network in West Vale cannot cope with the current traffic at rush hour. Traffic regularly backs up significantly on both Saddleworth Road and Stainland Road. The increase in cars and road usage through Greetland will lead to more traffic jams as they struggle to get through the bottle neck. This will have a detrimental effect on all sides of the traffic lights, including the ones which are located next to West Vale Primary School as well. Infrastructure. The amount of houses being planned in Greetland is

completely disproportionate to the size of the village. 600 new homes in total all being built off Saddleworth Road will increase the population of Greetland by around 30% in an area where the infrastructure is not appropriate. Greetland is a community in its own right but is a village, not a town. The local schools are full, the doctors and dentists' surgeries are not taking on new patients, the road network is pushed to breaking point, the sewer system is at capacity.

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

Duty to Co-operate Reason:

Suggested Modifications:

Sites with suitable infrastructure or brownfield sites should be considered.

Comments:

Additional Evidence Link:

Comment ID **HRU692**

Site ref (if applicable): **LP1625**

Person ID: **958415**

Name: **Miss Wendy Atkinson**

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 would like to object to the plans to build houses on the above greenfield land. Calderdale Council describes this land as being at risk of surface water flooding. It is devastating to see the land below this plot regularly flooded after short periods of heavy rainfall, which already threatens adjacent homes and undoubtedly impacts further downstream in West Vale and Elland Bridge, a bridge which partially collapsed in the floods of 2015, costing £5 million to rebuild and this closed a vital traffic route for almost 2 years. The ludicrous plans to build on this land absolutely beggars belief on these points alone. The land also provides essential habitat for our wildlife; we regularly see deer, owls and bats in the fields alongside Saddleworth Road. The traffic along Saddleworth Road is already very heavy; we have a large volume of heavy goods vehicles and tractors frequently using this road and congestion is a daily occurrence around the Greetland Academy School. The air and noise pollution from the current levels of traffic along Saddleworth Road is considerable and has already been quoted in your own list of 'constraints' for this plot. This noise and air pollution would increase dramatically if these plans go ahead. The young children attending the primary school alongside this road would bear the brunt of this air pollution. This land is an integral part of the community at Greetland. To have green spaces within walking distance of our homes must be a priority for Calderdale Council. Using these spaces is essential for mental and physical wellbeing.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU718**

Site ref (if applicable): **LP1625**

Person ID: **1242716**

Name: **Mrs Elyse Margetson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I am not qualified to assess this. However, I would comment that the process to object is neither easy or straight forward and the online forms and documents presented are complicated, lack clarity and make it challenging and off-putting to object. Although I am a technologically literate person I have found it onerous to find my way around the information. Additionally, I feel that insufficient time has been allowed for full consideration of all the documents which need to be read to understand this issue fully and for objections to be made. I also have significant concerns about the way in which the Local Plan has developed and cannot be sure that it is free from political bias. Having read the report ' CC37 - Potential Sites - considered and rejected, November 2019 - Report on options rejected ' I see that the main difference with those sites rejected and the sites LP0026, LP0177, LP0952 and LP1625 which were accepted were that they didn't have a developer on board! This makes me very concerned that the desire to develop land quickly, because there is a ' developer on board ', may have been a key factor as to whether a particular location was included in the Local Plan, especially as I note that in the Consultation comments there are already a set of plans from Barratt Homes for site LP0177. The interest and profits of prospective developers should not be a reason at all (never mind a key reason) for a site being included or excluded from the plan. The other reasons cited for excluding sites such as Green Belt, Access, Wildlife issues, Flooding constraints all apply to sites LP0026, LP0177, LP0952 and LP1625 and therefore these sites should equally be rejected from the Local plan. Importantly, I would also comment that plans LP0026 (The Gate Farm), LP0177 (Land adjacent Ellistones Place), LP0952 (Land at New Gate Farm) and LP1625 (Land to the west of Silverdale Terrace) should not be considered as separate proposals. They are so interrelated (sited within a small 1 km area along Saddleworth Road) that they can only be assessed fairly if considered as a whole. By splitting them out as separate plans the full picture is being concealed. My comments therefore are relevant to each of the plans LP0026, LP0177, LP0952 and LP1625 and should be considered as equal objections to all four sites.

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

Sound Reason:

As a non-specialist lay person I can only comment from a personal, common sense and non-political perspective as someone who has lived within the Greetland community for a number of years and who has attempted to read the various policy documents attached to the local plan. My main points of objection are as follows: Loss of Greenbelt land Increased risk of flooding Loss of Wildlife Habitats Lack of Infrastructure Traffic congestion, air pollution and noise pollution 1. Loss of Greenbelt Land Once it's gone,

it's gone! We cannot bring back Greenbelt Land once it has been built upon. Land that is precious to this community and to the wider community - from a visual, physical and emotional perspective - to both humans and wild animals. Para 98 of the National Planning Policy Framework (NPPF) states that ' Planning Policies and decisions should protect and enhance public rights of way and access '. There are public footpaths through all the sites in the proposed development plans which are used by groups and individuals from both within the local community and from further afield. I personally regularly use these public footpaths to dog walk. It is important to have this safe space to exercise, particularly as it feels unsafe to walk along the main Saddleworth Road with the heavy lorries hurtling down, and with many of the side roads having no or insufficient pavements. I am also aware that many Duke of Edinburgh groups use these public rights of way as part of their expedition practices (both of my daughters have taken part in such walks). To take away these footpaths is to deny our young people the opportunity to enjoy the countryside and open air whilst undertaking physical activity in a natural and safe environment, away from traffic, crime and pollution. To allow these developments would be to create urban sprawl, gradually encroaching on precious greenbelt Land that our community relies on for our wellbeing. The NPPF at a para 133 states that - " The Government attaches great importance to Green Belts " and at para 136 that - " Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified " At para 144 it further states - " local planning authorities should ensure that substantial weight is given to any harm to the green belt " and at para 145 - " a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt " Building on these sites is contradictory to all of these statements. I do not see any exceptional circumstances evidenced or justified in these proposals to allow building on this Greenbelt land. I note that comments, from what appears to be the Council, have been made on each individual plan to the effect that ' The site is currently designated as greenbelt but also performs the function of a natural/semi-natural open space. An assessment of open space in the area shows that there are sufficient alternative natural/semi-natural areas within the catchment of this site to meet the adopted standards ' - I do not agree with this statement. When each of the 4 sites are reviewed together a large and disproportionate area of open space would be lost to this small community. At para 137 the NPPF states ' 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. '. I do not agree that the authority in this case has satisfied these conditions. There are many other sites, including disused mills, within the Calderdale catchment that do not sit within Greenbelt Land that could be considered for development before ruining for ever the Greenbelt Land in these sites.

2. Increased risk of flooding I have lived within this community for just over 4 years and within that time the area has suffered extreme and severe flooding on 2 occasions, the latest being on 9th February 2020 with Storm Ciara. The effects are plain to see and are all over social media for anybody to review. Para 155 of the NPPF states that ' Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas of highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere ' Greetland is a high risk flood area within Calderdale. The Greenbelt Land within these proposed development sites act as a natural soak away and flood defence both within its own locality and all along Saddleworth Road. As you move further down West Vale the land soaks up a vast quantity of rainwater as well as the natural springs that pop up all over the hillsides of Greetland. Losing these flood plains would cause the water to simply be diverted elsewhere, causing certain flooding further down the area. Examples are being seen already of these sorts of issues in other local areas as planners failed to account for the loss of natural flood plains (for example see link <https://www.halifaxcourier.co.uk/business/giant-factory-building-work-calderdale-firm-causing-flooding-houses-claim-residents-1556588>). I urge the decision makers to think logically and show some common sense in realising that you cannot keep taking away the natural flood plains without it causing devastating consequences. The frequency of flooding is only set to increase with the change in weather conditions we are experiencing through global warming. The natural flood plains are therefore becoming increasingly



important to our communities. No measure of mitigation can take away these natural resources - all they do is push the issue further down into other areas. To build on these sites would not only guarantee flooding issues and untold misery for residents and local businesses but cause increased expenditure for the council and local authorities as they will be required to assist with clean up operations, as has been seen over the last week or so in many parts of Calderdale. Para 158 NPPF states 'Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding'. I do not see any evidence that the planning authority has exhausted other options of seeking development sites in lower risk flooding areas.

3. Loss of Wildlife Habitats I often see wild deer running through the fields. I regularly witness squirrels, pheasants, bats and foxes in the area. Para 177 NPPF states that 'The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site'. I would argue that building on the land which is included in these proposals will be extremely detrimental to the wild animals within the area. No mitigation can prevent the impact of urban sprawl and the destruction of their natural habitats.

4. Lack of Infrastructure The local schools are already full. The local dentists have long NHS waiting lists. The GP surgery is full and often can't accommodate appointment requests. Adding an additional 600+ houses and the associated increase in residents is simply unsustainable. The local bus services are already inadequate for the community. The 503 which passes through West Vale is often so full that it does not stop to pick up passengers at peak times or it is delayed 20-30+ minutes because of the traffic. The 343 which passes through Saddleworth Road only once per hour takes up to an hour to reach the destinations of Huddersfield or Halifax. The bus stops for the 343 are only on one side of Saddleworth Road, making it extremely unsafe for the young and elderly alike. Since moving here and hoping that my teenage children would be able to get the bus to school, we have found that it simply is not feasible or safe for them to do so. How will adding additional residents - who will also need to use their cars - improve this situation? The local roads are already riddled with potholes and are constantly patched (an unsatisfactory and unsustainable situation). They are constantly under repair as the local drainage system is ineffective and causes regular surface issues. Add to that a level of increased traffic caused by the development as proposed and the road conditions will be worsened even further. Specifically with regard to site LP0026, the preferred access as stated on the plans is off the lower section of Scar Bottom Lane. For anybody who knows this road and uses it regularly, creating an access point on it to this housing development is ridiculous. It is a narrow lane with no pavements and dry stone walls at either side. It is already not wide enough for 2 cars to pass without having to come to a virtual standstill. It is certainly not wide enough to create an access point for 60-70 houses. I can see nothing in the proposals to remedy the lack of infrastructure.

5. Traffic congestion, air pollution and noise pollution Greetland and West Vale already suffer chronic traffic congestion, with the roads used not only by locals but also by the large wagons travelling to and from the Bosch Industrial Estate and the Sonoco factory. In addition, the road is used as a cut through from Ripponden and the M62. The village is already at breaking point at peak times and the roads cannot cope with the existing volume of traffic, let alone adding to that with these proposed developments. At school drop off times Saddleworth Road becomes a single lane road due to the parked cars on both sides. It becomes an obstacle course to get through and the large lorries that frequent the area make it dangerous for road users and pedestrians. I fear for the lives of the children trying to get to school daily. Adding the level of traffic that would be inevitable with the proposed development would be frankly overwhelming. By increasing the congestion in the area, the air pollution will by default increase. This will especially have enormous impact on the young children attending the schools in the area and Sunnybank Pre-school with its playground just metres away from the busy congested road. Similarly, a disproportionate scale of building in this area would create a disproportionate increase in the level of noise pollution to this community.

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

Duty to Co-operate Reason:

I do not understand what this means.

Suggested Modifications:

Proposed plans LP0026 (The Gate Farm), LP0177 (Land adjacent Ellistones Place), LP0952 (Land at New Gate Farm) and LP1625 (Land to the west of Silverdale Terrace) should all be removed from the Local Plan

Comments:

Additional Evidence Link:

Comment ID **HRU724**

Site ref (if applicable):

Person ID: **1239176**

Name: **MRS Jo Greidanus**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Please refer to Calderdale's Statement of Community Involvement, which has not been followed in this process. CMBC have already stated "These sites lies within the approved Green Belt. The proposed development does not meet the exceptions, as it does not preserve openness and conflicts with the purpose of including land in the Green Belt. As such, it represents inappropriate development in the Green Belt, which is, by definition, harmful. No very special circumstances have been demonstrated to clearly outweigh the harm caused by the development. It is therefore considered that the proposal would be contrary to NPPF Chapter 13 (Protecting Green Belt Land)"

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

Sound Reason:

LP0177, LP0026, LP0952 and LP1625 are so close in proximity that they should be viewed jointly as well as individually. They are all in Greetland which is not Elland so why have they been recorded on this plan as Elland. Main points of objection 1 - Flooding 2 - Loss of green belt and impact on wildlife corridor 3 - Air Pollution and Traffic 4 - Infrastructure Flooding The DEFRA 25year plan states that "National flood management involves the use of a variety of measures including storing water on open land". NPPF 14 (157b) states that plans should work to safeguard land from development that is required or likely to be required for current and future flood management. The flood plains that these sites provide are critical and flood regularly (as can be seen today) ; soaking up excess water at times of heavy rainfall, allowing space for the water to flow and be stored on open land in times of flood, even after the river has burst its bank, and protecting land further downstream from potential flooding. Developing these sites is completely contradictory to this DEFRA plan and the NPPF. The current policy and legislation on flooding states -"due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere. Chapter 14, paragraph 163 of the NPPF states: -" When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere It is abundantly clear that any development on theses sites would directly oppose all these pieces of legislation and policies and would hugely increase the risk of flooding to both surrounding properties and the wider community in Greetland,

West Vale and even as far as Elland. Any development of these sites and reduction in the capacity of these flood plains will only ensure that the flooding we now see will be more frequent and cause even more damage. This is not acceptable or fair therefore these sites should be removed from the local plan. Loss of Green Belt and Wildlife Corridor Esther McVey, our current Housing Minister's written policy on Green Belt land states "protecting the Green Belt goes beyond protection against development" NPPF chapter 13 states that there are 5 purposes to green belt land- CMBC has already stated that this land strongly fulfils these 5 purposes. NPPF ch13 paragraph 143 states "Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances". Protecting the green belt is very important. To include these sites in the local plan goes against all the above policies and there is no evidence of any special circumstances to support development on this land. The sites are a wildlife habitat for many many different species. CMBC has already stated that a constraint is that Black Brook running through LP0177 is a UK BAP priority habitat. NPPF Chapter 15 states that planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes and sites of biodiversity. It also states - to protect and enhance biodiversity and geodiversity, plans should: identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including wildlife corridors. Developing these sites will put this precious wildlife corridor and all its inhabitants at great risk directly opposing the NPPF legislation and the DEFRA 25 Year Plan. This site should therefore be removed from the local plan Air Pollution and Traffic Congestion Air pollution and traffic congestion obviously go hand in hand. The junction of Saddleworth Road and Stainland Road in West Vale is already a bottle neck and far too congested and unable to cope with the traffic volume that passes through it on a daily basis. WSP Parsons Brinckerhoff Report on this Transport Network identifies that traffic congestion at the juncture of Stainland Road-Saddleworth Road would increase by approximately 105% traffic congestion at the juncture of Stainland Road-Rochdale Road would increase by over 100% Public Health England (PHE) (11th March 2019) reports that air pollution is the biggest environmental threat to health in the UK, with between 28,000 and 36,000 deaths a year attributed to long-term exposure. There is strong evidence that air pollution causes the development of coronary heart disease, stroke, respiratory disease and lung cancer, and exacerbates asthma. Professor Paul Cosford, Director of Health Protection and Medical Director at PHE, said: "Now is our opportunity to create a clean air generation of children Key interventions local authorities can take include redesigning cities so people aren't so close to highly polluting roads." Professor Cosford said: We recommend that at a local level, any new policy or programme of work which affects air pollution should aim to deliver an overall benefit to the public's health. Greetland School and Sunnybank Pre School are right on Saddleworth Road at the boundary of LP0177. The increase in traffic of over 100% and therefore pollution, that will be an outcome of development on this site ignores all the recommendations of PHE and put many people's health at risk especially that of our children which is totally unacceptable. Infrastructure Greetland Primary Academy, West Vale Primary School and Brooksbank High School are all full. With a proposed 600 houses, using Calderdale MBC's figure for school places of .36 per household (IDP section 9.14) this indicates another 206 school places would be needed. Where are these places to be found? Local Dentist has a waiting list of 600 for NHS places. The nearest NHS dentist was recently found (July 2019) 11 miles away in Kirklees. Local GP surgeries are already full. It is obvious that building a further 600 houses within this area will completely overwhelm the existing infrastructure making this land unsuitable to develop. Summary There are so many constraints and negatives to all these sites that cannot be adequately mitigated against. To develop these sites opposes so many policies, recommendations and pieces of legislation which CMBC appear to have given little or no consideration to. I respectfully ask that these sites are removed from the Local Plan. They should never have been included as they are completely unsuitable for numerous reasons. As this portal is difficult to use and I have struggled to attach the photo evidence of flooding that I have mentioned, I will be also emailing my objection with photos attached.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5610062> ; <http://calderdale-consult.objective.co.uk/file/5610072> ; <http://calderdale-consult.objective.co.uk/file/5632244> ; [http://calderdale-consult.o](http://calderdale-consult.objective.co.uk/file/5632262)

Comment ID **HRU728**

Site ref (if applicable): **LP1265**

Person ID: **959779**

Name: **Mr Stephen Cunningham**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The revised Calderdale Plan was drawn up between 2016-18 and is no longer fit for purpose. The UK has just seen its biggest change in 47 year as we have now left the EU. The plan was based on housing requirements that supported the economic growth plan. The plans are not current and not compliant. Economic growth should be called for review

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

Sound Reason:

My objection to the proposed planning application is referenced where possible using sections of the National Planning Policy Framework (NPPF) the relevant paragraphs are referenced in brackets. Negative impact on the Green Belt The proposed development represents a disproportionate amount of new development in Greetland. It will lead to urban sprawl (NPPF 134a); it also encroaches on important green space (134c), removes natural habitat (174a) and takes away an integral part of the wildlife corridor (170d). The Government supposedly attaches great importance to the Green Belt (133). The aim of Green Belt policy is to keep the land permanently open for the benefit, enjoyment and wellbeing of people. It also exists to support biodiversity and enhance the local landscape and visual amenity (141). If the proposed application ; along with other similar proposals - is passed we lose the Green Belt forever. This should only happen in exceptional circumstances (136). What are these exceptional circumstances? This proposal would be harmful to the Greenbelt so should not be approved (143). I have lived in Greetland for many years and seen large areas of green space lost to infilling. The demolition of older properties to accommodate new housing developments has led to the loss of trees, wildlife habitat and buildings of historical interest. We have also lost moorland; large gardens have been built on, even graveyards and recreational space has been developed. The argument for this infilling from Calderdale Council has always been that unless we accept it we will lose the greenbelt! Now that there is no place left to infill they want to start taking away the greenbelt. If we carry on like this Greetland will lose all its green space and biodiversity. The function of the Calderdale Council Planning Department is to facilitate sustainable development that make a positive contribution to the local environment (144). It is NOT the role of the Council to make unacceptable sites within the Green Belt available to meet their housing targets. Flooding The proposed development will only add to our current climate change problems. This is already in the

balance. On Sunday 9<sup>th</sup> February I parked next to the Black Brook in West Vale to buy groceries. The water line was close to bursting. I then walked towards the rugby club on Stainland Road where the river Calder had overflowed into the nearby fields. The football pitches and rugby club were under several feet of water. Buildings and cars were completely submerged, roads barely passable. I also discovered later that a large shipping container used to store equipment at the rugby club had been washed down river and had collided with Elland Bridge ; only recently re-opened in 2016 after previous collision damage during a flood. How can Calderdale Council declare a 'Climate emergency' then allow this development to proceed? The loss of flood plain and increase in run-off water from the proposed developments will only increase the likelihood of such devastation and further reduce local resilience to climate change (155, 156, 157). It will not only increase the flood risk in West Vale and Elland (163) but other areas along the Calder.

Infrastructure The development ; in conjunction with others ; will place a great strain on local services. Will new schools be built? How will the road network cope? The sewage and drainage systems are already at full stretch. Will there be new Health surgeries and Dental practices built into the proposals? This isn't acceptable to the local community (124) and it will not improve the character or function of the local area (130). Traffic impacts, congestion and air pollution Congestion at the junction of Sadleworth and Stainland Roads ; often backed up as far as Greetland Infants - is already unacceptable. At present it can take 20 minutes to get through the junction at peak times. Adding all the extra commuter traffic from the proposed development will increase congestion and the levels of harmful greenhouse gasses - nitrous oxide, carbon dioxide etc. This will have a detrimental affect on the health of local people particularly children at the school. The NPPF supports a low carbon future that helps to reduce greenhouse gasses and minimises flood risk (148, 149, 150a,b) not increase them. The proposed development is not sustainable in NPPF terms. It actually goes against many key criteria set out in the NPPF. When the harm identifiers are considered the proposals is not even close to being sustainable. I don't think Calderdale Council could actually have got it more wrong ; and they talk about a Climate Emergency! Not for the first time I watched this Climate Emergency play out in front of my own eyes last week; flooded roads, rivers bursting their banks, cars under water, homes and businesses completely destroyed ; real people devastated. It's easy for Calderdale Council to stand up and say anything - I think the time has come for them to stop talking and start taking some positive action to help local people and their communities.

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

Duty to Co-operate Reason:

Suggested Modifications:

The revised Calderdale Plan was drawn up between 2016-18 and is no longer fit for purpose. The UK has just seen its biggest change in 47 year as we have now left the EU. The plan was based on housing requirements that supported the economic growth plan. The plans are not current and not compliant. Economic growth should be called for review and a new plan developed that reflects the changed political and economic horizons.

Comments:

Additional Evidence Link:

Comment ID **HRU735**

Site ref (if applicable): **LP1625**

Person ID: **1116556**

Name: **Mr Roger Nichols**

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:

The whole development from West Vale west up Saddleworth Road will increase the population of the area very very considerably and reduce the irreplaceable green belt space between Greetland and Barkisland. Once green belt land is lost it is lost for ever. While some very small amount of building may be necessary for new housing in the West Vale area we feel that the western end of the development proposed up Saddleworth Road should be preserved entirely as green belt to maintain the character of the area along with the existing wildlife of the area. There are a very large number of brownfield sites available for development in Halifax and Calderdale, for example the demolished mill at the bottom of Saddleworth Road which makes it totally unnecessary to build on the precious green belt space. We would also mention that the recent storms we have experienced have brought to mind the massive amount of water which runs off Norland Moor down the hillside into the valley. At the time of writing there is a constant stream of water running down the local roads and gardens. This water has to go somewhere and will flood sites lower down the valley. With global warming the storms will only become more severe and more frequent with all the consequence this will bring. Local residents are concerned regarding access to facilities in the area. As far as we are aware, the schools are full as are the doctors and dentists. There is already a shortage of doctors, both locally and nationally, hence more housing will make an existing problem even worse. It can be difficult enough already to get an appointment within a reasonable time at our local medical centre without more people having to be accommodated. The further problem concerns the traffic flow in the area. Saddleworth Road already carries a large volume of cars and heavy lorries and at rush hour the congestion at the traffic lights in West Vale can cause very considerable problems indeed. Increased housing, and hence increased car numbers, will only make the present problems even worse and increase air pollution from slow moving and idling engines. Finally we would question the demand for more housing on such a large scale in Calderdale. As far as we are aware there is not massive unemployment or a large number of homeless families in the area so why do we need such massive an increase in housing provision? If the idea is to create dormitory areas for people who work in Leeds or Manchester this is totally impractical. The M62 suffers much congestion during the day and is totally jammed at rush hours. Also, as has been highlighted recently in the national media, the train service which runs through the Calder Valley is a joke - extremely inefficient and unreliable. Finally, If there is a demonstrated demand for more housing it should be allocated fairly round the whole of Calderdale, not concentrated in one particular area and brownfield land only should be used and not the precious irreplaceable green belt.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU746**

Site ref (if applicable): **LP1625**

Person ID: **1241652**

Name: **R Graham Maslen**

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:

Calderdale's Review of the Green Belt in 2017 showed that this plot (LP1625) performed well in the three (out of 5) relevant key purposes of Green Belts as identified in the NPPF. -to check the unrestricted sprawl of large built-up areas; -to prevent neighbouring towns from merging into one another; -to assist in safeguarding the countryside from encroachment; This parcel also meets five of the six objectives for the Green Belt identified by the Local Authority: -to provide opportunities for access to the open countryside for the urban population; -to provide opportunities for outdoor sport and outdoor recreation near urban areas; -to retain attractive landscapes, and enhance landscapes, near to where people live; -to secure nature conservation interest; and, -to retain land in agricultural, forestry and related uses. Given that this parcel performs well as part of Calderdale's and Greetland's Green Belt the Local Authority has not specified the exceptional circumstances that must be present to develop green belt land. The Local Authority states it has adopted a sequential approach to identifying potential sites for housing development. It has not exactly specified what the sequence was but the following is included in 'Addendum for Exceptional Circumstances Technical Paper' 2019. Regeneration and brownfield sites near town centres Sites which can be delivered quickly Sites with a creative mixed use New allocations in sustainable locations close to existing or planned transport investments and established transport corridors It is not clear that all the brownfield sites were considered before sites which could be delivered quickly or whether these conditions were considered together. This site would clearly come under the last category. The Local Authority has not demonstrated that it has examined all other options. We need a list of all the potential brownfield sites available in Calderdale and whether they are being developed and if not why not? Anyone walking around Halifax would be aware of the number of disused and derelict sites that have remained undeveloped for years. Why are Green Belt sites even being considered for development when these sites remain vacant? We, as residents in this Local Authority, deserve transparency in relation to this issue. Proposing to build on Green Belt land seems to run counter to the policies that will be needed to support the Council's declaration of a Climate Emergency. The Climate Emergency was proposed by Councillor Sutherland in January 2019 and he challenged the Council over its response to Katie Child's letter at a Cabinet meeting on October 14th, 'Councillor Sutherland addressed the Cabinet and highlighted a concern that consideration had only been given to one choice from the Inspector's letter, in relation to increased housing allocation; however a key part of the Plan was to revise economic growth and this was something which could be considered. There were not many opportunities for the Council to make decisions in Planning, and once greenbelt sites were built on, there would be no opportunities to change this which would have a lasting impact on Calderdale. In essence, what were the tangible benefits on these sites and how would these be balanced and tested?'. There is indeed scant consideration by the Council to reviewing its economic forecast other than an assertion (without proper analysis or evidence) that if they were to do this somehow the Plan would begin to unravel. The residents of Greetland and the citizens of Calderdale deserve better than this. Building 30 houses on this land would extend the built-up area of Greetland and undermine one of the fundamental objectives of Green Belt designation. The development of this site would further contribute to the extension of Greetland towards

Holywell Green compromising the integrity of Greetland as a community. In the Site Assessment Report it states that, 'The Site is currently designated as greenbelt but also performs the function of a natural/semi-natural open space. An assessment of open space in the area shows that there are sufficient alternative natural/semi-natural areas within the catchment of this site to meet the adopted standards'. This is a curious assessment because it does not address the loss of this plot of land currently used for pasture. There may be other open spaces in the area but they are not this open space in this location" Flooding This is sloping land above the Black Brook. Whilst it is not on the flood plain and the Council's analysis suggests there is only a 5% chance of it flooding every 100 years it is valuable in terms of slowing down the run off into the river. To mitigate the negative impact of building 30 houses on this site the Council is proposing green roofs and SuDS. Where is the evidence that these measures will be as effective as pasture land in terms of slowing and holding water in the catchment above the river? In the Council's own Infrastructure Delivery Plan it states that, 'Effective flood risk management is achieved partly by avoidance of inappropriate development in high risk zones'. There is an opportunity to put that strategy into practice with regard to this site. Ecology The Site Assessment Report states that there is, 'Unlikely to be significant adverse ecological impacts'. There will be a loss of habitat for the newts, heron, jay, bats, woodpecker, deer and kingfishers that have been seen on this site. Highways The addition of 30 houses would on its own have a limited effect on the local traffic circulation but as the Site Assessment Report states, 'Likely to be a cumulative traffic impact if developed along with other potential sites south of Saddleworth Road. Assessment of local network required to address impact on Stainland Road junction with Saddleworth Road'. The proposals for the West Vale junctions currently in the Infrastructure Delivery Plan are wholly inadequate. Environmental Health The Site Assessment Report merely states that there will be no detrimental effects. This development will impact on air quality and noise pollution. The addition of a further 30 houses will contribute to a an increase in noise and a deterioration in air quality. Infrastructure The NPPF recommends that developments should have regard to the supply of school places and services. There is currently no provision in the Infrastructure Delivery Plan for the expansion of primary school places in Greetland and provision for only an additional 75 secondary places. There are no plans for additional dentists.

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

Duty to Co-operate Reason:

Suggested Modifications:

This site should remain as Green Belt and not be developed for housing.

Comments:

Additional Evidence Link:

Comment ID **HRU753**

Site ref (if applicable): **LP0026**

Person ID: **1130071**

Name: **Mr Raymond Wilkinson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

because the proposal does not meet the government's requirements as detailed in the NPPF



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

Sound Reason:

Objections to use of Green Belt along Saddleworth Road This Planning Proposal goes against many of the paragraphs in the Government's NPPF. Flooding The Greetland hillside is riddled with many springs. At times of high rainfall, these can overflow onto the fields and even onto Saddleworth Road; on certain occasions causing extensive flooding. This is only likely to get worse with global warming, and the addition of many houses will reduce the absorbent effect of the fields, increasing the risk of flooding. At the bottom of the valley, the little Black Brook is likely to overflow, causing further flooding in West Vale at the bottom of the valley. Many paragraphs in the NPPF are relevant here; in particular para 148:- "Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk." And paras 155 & 156:- "Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). - " "Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.-" Other objectors have shown pictures of instances of excessive flooding in the fields and we have seen excessive water flowing down Saddleworth Road like a river. Pollution Saddleworth Road slopes downhill in an easterly direction, and the only road outlet is at West Vale traffic lights, controlling the junction with Stainland Road. This, in conjunction with the adjacent Rochdale Road/Stainland Road junction, is plagued with long traffic delays, particularly at rush hour times. Delays here can be half an hour or more, and the resulting pollution from so much traffic affects not only residents along the roads, but also two schools and several old people's homes. The addition of many houses in this proposal would increase this pollution many-fold. The NPPF is clear on this issue, e.g. para 180:- "Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development." And para. 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." Retention of the Green Belt The NPPF is clear about the need for retention of the Green Belt except under "Exceptional circumstances" Para 133 states:- "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." And para 136:- "Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period." The Planning proposal does not justify any exceptional circumstances, since there are alternative areas for additional housing, for example brownfield sites. Para 137 states:- "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" | ..makes as much use as possible of suitable brownfield sites and underutilised land." | Infrastructure The schools, doctors and dentist are already full""where are the proposals for increased infrastructure? I understand that the sewer system around Saddleworth Road is also near or beyond its capacity. What will be the impact of 600 extra houses? Para. 122 states:- Planning policies should take into account " | .." | the availability and capacity of infrastructure and services ; both existing and proposed ; as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use." | Environment The NPPF emphasises the need for space for recreational facilities. For example, paras. 96 to 98:- -"Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate." | And:- -"Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless" | . an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements" | And:- -"Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users." | .. they should -"provide for high quality walking and cycling networks." | These fields and footpaths in the Green Belt area are extensively used for recreation, and exercise: walking, cycling, etc. Other objectors have already highlighted factors such as the impact on wildlife and wildlife corridors, and the need to plant more trees. All of this demonstrates that this proposal goes against the Government's National Planning Policy Framework, as well as being unsustainable from every consideration.

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

Duty to Co-operate Reason:

For the reasons detailed above

Suggested Modifications:

Do not build on Green Belt land, but use brownfield sites

Comments:

Additional Evidence Link:

Comment ID **HRU757**

Site ref (if applicable): **LP1625**

Person ID: **960048**

Name: **Mr Gerald Stancliffe**

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:

Four sites are proposed Lp0952 new gate farm / Lp1625 silverdale terrace / Lp0177 ellistones place /

Lp0026. an extra 1200 or more journeys a day will bring chaos, to the already overcrowded roads. Especially at west vale if there are any roadworks about will be total gridlock,also the infrastructure would not support any extra residents, the infant and junior school is full so is dentist and doctors, such amount of traffic will cause cause air pollution to a danger level especially to the elderly and small children at sunny bank school which is at road level. the proposed build is on mainly flood plain which floods fairly regular, this green belt corridor is a haven to wildlife and plants, roe deer, fox, herons, malards and other small mammals visit regular so does hikers dog walkers people walk along the beck side for exercise and admire the scenery, to loose this green belt site it would be a disaster and would be lost forever. do the right thing and reject the plan for 600 houses.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU762**

Site ref (if applicable):

Person ID: **1243285**

Name: **Mrs Karen Bagley**

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 writing to register our objections to the planning proposal off Saddleworth Road, Greetland. The reasons for objections are widespread but the most critical are as follows: **FLOOD PLAIN** ; the area proposed is on a natural flood plain and natural springs flowing down the Greetland hillside culminate at the proposed site. There is photographic evidence that local houses are subject to flooding already, so any further building would have a catastrophic effect on flooding in the area and beyond to West Vale and Elland. (Elland Bridge collapsed in 2015; Park Road in Elland floods every year; Heath Rugby club and Newbank Garden Centre in West Vale, prone to flooding regularly). There is photographic evidence to support this from residents as at today's date 9 th February 2020, when the flooding is at it's peak. **GREEN BELT** ; this is green belt land and as such, should be protected. Why aren't the council considering all the 'brown field' sites as a priority? This is a wildlife corridor - there are many protected species of animals and birds in the area, and it is used as a nature walk by all the community. **POLLUTION / AIR QUALITY** ; The pollution caused from a further potential 1200 cars on the roads is unimaginable and the health of the Junior School children would be at a high risk as would the whole community. It is a fact that increased pollution would seriously affect the health of our children both now and in future generations. **INFRASTRUCTURE** - the infrastructure is simply not geared up to cope with 600+ houses in that area, this would constitute a small 'village' in it's own right! Traffic is already chaotic in West Vale, how could the

area cope with another 1200 cars in the area? Doctor's surgeries are already at capacity and the local school has no capacity to extend. We appreciate that there has to be a certain percentage of new housing developments in every village and town but a proposal for 600+ houses in this area is not acceptable on any level. This would cause catastrophic consequences to the area of Greetland and surrounding villages. This is in addition to a further potential development ; LP1407, which should be taken into consideration prior to any decisions on LP0026, LP0177, LP0952 and LP1625.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU763**

Site ref (if applicable):

Person ID: **1243284**      Name: **Mr Martin Bagley**      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 writing to register our objections to the planning proposal off Saddleworth Road, Greetland. The reasons for objections are widespread but the most critical are as follows: FLOOD PLAIN ; the area proposed is on a natural flood plain and natural springs flowing down the Greetland hillside culminate at the proposed site. There is photographic evidence that local houses are subject to flooding already, so any further building would have a catastrophic effect on flooding in the area and beyond to West Vale and Elland. (Elland Bridge collapsed in 2015; Park Road in Elland floods every year; Heath Rugby club and Newbank Garden Centre in West Vale, prone to flooding regularly). There is photographic evidence to support this from residents as at today's date 9 th February 2020, when the flooding is at it's peak. GREEN BELT ; this is green belt land and as such, should be protected. Why aren't the council considering all the 'brown field' sites as a priority? This is a wildlife corridor - there are many protected species of animals and birds in the area, and it is used as a nature walk by all the community. POLLUTION / AIR QUALITY ; The pollution caused from a further potential 1200 cars on the roads is unimaginable and the health of the Junior School children would be at a high risk as would the whole community. It is a fact that increased pollution would seriously affect the health of our children both now and in future generations. INFRASTRUCTURE - the infrastructure is simply not geared up to cope with 600+ houses in that area, this would constitute a small 'village' in it's own right! Traffic is already chaotic in West Vale, how could the area cope with another 1200 cars in the area? Doctor's surgeries are already at capacity and the local school has no capacity to extend. We appreciate that there has to be a certain percentage of new housing developments in every village and town but a proposal for 600+ houses in this area is not acceptable on

any level. This would cause catastrophic consequences to the area of Greetland and surrounding villages. This is in addition to a further potential development ; LP1407, which should be taken into consideration prior to any decisions on LP0026, LP0177, LP0952 and LP1625.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU773**

Site ref (if applicable): **LP1625**

Person ID: **1242630**      Name: **Mrs Jayne Wallace**      Organisation:

Agent ID:      Name:      Organisation:

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

Legal Compliance Reason:

1. Loss of greenbelt for ever when brownfield sites need to be developed as a priority regardless of profit potentially been reduced for the greedy developers, potentially for urban sprawl and where will it all end?!  
2. Increase risk of flooding to properties and business's down stream, will the developer be making funds available from the huge profit they would make to compensate for flood damaged homes, business's who may have to shut down leading to make unemployment or will it be the council of government who help these poor people out? NONE I suspect but the question needs to be asked..... 3. The lack of infrastructure is a shamble without an additional 1000 plus vehicles on the road causing congestion at the traffic lights. Over subscribed schools, leading to even more vehicles on the road as parents have to use their vehicles to transport their children to an from school. Doctors surgeries and NHS dentist would not cope, there is already a 600+ waiting list already! No planned local employment leading to people have to commute to work!!

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:

Comments:

Additional Evidence Link:

Comment ID **HRU808**

Site ref (if applicable): **LP1625**

Person ID: **1243003**

Name: **Mr Richard Corney**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The Local Plan does not address the implications of the National Planning Policy Framework, especially, NPPF Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. According to the NPPF Para 143 under 'Proposals affecting the Green Belt' it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' The very special circumstances are non-existent in this site. This development would definitely contribute to future flooding in the area. The plans have in no way had any in-depth consideration and the impact on the infrastructure, environment and community will be devastating. One of the Greetland councillors - Marilyn Greenwood stated that she was not even told about the Planning Meeting when this plot was added!

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

Sound Reason:

Points of Objections Air Pollution Flooding Infrastructure Wildlife Traffic Congestion Loss of Public Space  
1 Air Pollution The severe increase in traffic (potential for 1200 additional cars which could equate to 2400 journeys each day) down an already congested Saddleworth Road. Already in peak periods the traffic backs up Saddleworth Road for at least ¼ mile with engines running! No air quality assessment has been undertaken in this area so we don't even know the extent of air pollution before the proposed development. Greetland Academy has the playground for nursery children right at the side of the road ; goodness knows how the proposed development will impact on these vulnerable, very young children which goes against the Government's strategy on air quality. 2 Flooding The area concerned floods at least once a year in varying degrees ; the worst instances have been Boxing Day 2015 and recently 9 th February 2020, the development will have a significant detrimental impact on flooding. The run off into Black Brook will cause serious downstream effects, for example, the floods of 9 th February saw Greetland Cricket Club, Heath Rugby Club and Clayhouse Park all under water ; so it is hard to understand how any flood plan could mitigate against the risk of even more severe flooding in West Vale leading to major issues for all the businesses and residents. It is impossible to understand how the proposals in the local plan can be in any way aligned to the recent declaration by Calderdale Council of a climate emergency. These proposals will inevitably lead to a flooding emergency, probably not what the Council had in mind by its declaration. 3 Infrastructure The development has only one road in and out and all the residents would have to use their cars as the development is not on a regular bus route ; again going against Government Transport Policy. Local schools are over-subscribed meaning parents will have to use their cars to take children to schools out of the area. All doctors surgeries are currently full and one is soon to close again impacting on the two remaining local ones. Other developments in the area have been mainly 3 and 4 bedroom houses (not affordable housing for local people). This type of housing attracts commuters who typically work in Leeds or Manchester and will therefore have to travel to the motorway via West Vale or Ripponden neither which can cope with traffic as it is today! 4 Wildlife The local wildlife will be decimated by any further development particularly birdlife such as Herons, Kestrels, Kingfishers which are seen very regularly flying around the area. 5 Traffic Congestion It is already extremely difficult to pass through the traffic lights at West Vale and the development will only add to the congestion both in West Vale and also Ripponden. 6 Loss of Public Space The area concerned is a very valuable green space for people of all ages to enjoy daily

and is extremely popular with walkers, runners, etc. It is a really tranquil spot where people can get away from the stresses of life. It is also within walking distance of the local community and therefore people do not have to drive to enjoy the countryside.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU812**

Site ref (if applicable): **LP1625**

Person ID: **1243147**

Name: **Mrs Sue Corney**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The Local Plan does not address the implications of the National Planning Policy Framework, especially, NPPF Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. According to the NPPF Para 143 under 'Proposals affecting the Green Belt' it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' The very special circumstances are non-existent in this site. This development would definitely contribute to future flooding in the area. The plans have in no way had any in-depth consideration and the impact on the infrastructure, environment and community will be devastating. One of the Greetland councillors - Marilyn Greenwood stated that she was not even told about the Planning Meeting when this plot was added!

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

Sound Reason:

Points of Objections Air Pollution Flooding Infrastructure Wildlife Traffic Congestion Loss of Public Space  
1 Air Pollution The severe increase in traffic (potential for 1200 additional cars which could equate to 2400 journeys each day) down an already congested Saddleworth Road. Already in peak periods the traffic backs up Saddleworth Road for at least ¼ mile with engines running! No air quality assessment has been undertaken in this area so we don't even know the extent of air pollution before the proposed development. Greetland Academy has the playground for nursery children right at the side of the road ; goodness knows how the proposed development will impact on these vulnerable, very young children which goes against the Government's strategy on air quality. 2 Flooding The area concerned floods at least once a year in varying degrees ; the worst instances have been Boxing Day 2015 and recently 9 th February 2020, the development will have a significant detrimental impact on flooding. The run off into Black Brook will cause serious downstream effects, for example, the floods of 9 th February saw Greetland Cricket Club, Heath Rugby Club and Clayhouse Park all under water ; so it is hard to understand how any flood plan could mitigate against the risk of even more severe flooding in West Vale leading to major issues for all the

businesses and residents. It is impossible to understand how the proposals in the local plan can be in any way aligned to the recent declaration by Calderdale Council of a climate emergency. These proposals will inevitably lead to a flooding emergency, probably not what the Council had in mind by its declaration.

3 Infrastructure The development has only one road in and out and all the residents would have to use their cars as the development is not on a regular bus route ; again going against Government Transport Policy. Local schools are over subscribed meaning parents will have to use their cars to take children to schools out of the area. All doctors surgeries are currently full and one is soon to close again impacting on the two remaining local ones. Other developments in the area have been mainly 3 and 4 bedroom houses (not affordable housing for local people). This type of housing attracts commuters who typically work in Leeds or Manchester and will therefore have to travel to the motorway via West Vale or Ripponden neither which can cope with traffic as it is today!

4 Wildlife The local wildlife will be decimated by any further development particularly birdlife such as Herons, Kestrels, Kingfishers which are seen very regularly flying around the area.

5 Traffic Congestion It is already extremely difficult to pass through the traffic lights at West Vale and the development will only add to the congestion both in West Vale and also Ripponden.

6 Loss of Public Space The area concerned is a very valuable green space for people of all ages to enjoy daily and is extremely popular with walkers, runners, etc. It is a really tranquil spot where people can get away from the stresses of life. It is also within walking distance of the local community and therefore people do not have to drive to enjoy the countryside.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU818**

Site ref (if applicable): **LP1625**

Person ID: **1243410**

Name: **Mrs Gina Walsh**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

1) The Calderdale Statement of Community Involvement 2015 states: -“We need to be very clear about what we are asking people and we must be sure that people understand what will happen as a result of this engagement. This includes being clear about what decisions have been made, what have not, and who will make the final decision.”

“The proposed site is directly opposite my front door and a development on this site would have a huge impact for my family and our family life, yet to this day, I have never received a single piece of correspondence regarding this proposal, therefore lacking the clarity and involvement which the SCI calls for. With regards to the online portal, LP1625 is listed as part of Elland, which it clearly isn't. This is misleading and means it is easy for the site to be overlooked by residents who otherwise would want to state their objection. The process is far from 'simple' and is certainly not making it 'easy to get involved.' (SCI 1.3)

2) In the words of Esther McVey, Housing Minister's written policy on Green Belt land: -“Of course one of the most important environmental safeguards we have is the Green Belt. And I



want to be clear that our commitment to this is as strong as ever, with any changes only happening in exceptional circumstances ; protecting the Green Belt goes beyond protection against development" In these circumstances, our Green Belt is not being protected. In the local plan, this site is being referred to as 'green field' when it is legally classed as 'green belt' and therefore should only be built on under exceptional circumstances and ' when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including :- making effective use of suitable brownfield sites.' ( The Government White Paper -“Fixing our Broken Housing Market”Parag 1.39) There are other suitable brownfield sites in the local area which could be used and therefore would mean the 'right houses were being built in the right places.'

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

Sound Reason:

Disproportionate amount of building in the Greetland area. As sites LP26, LP177, LP953 and LP1625 are so close in proximity they cannot be viewed individually as the overall impact of the local plan would be catastrophic to Greetland as a whole and the surrounding areas. Under the Calderdale Review of Polling Districts 2019, the number of properties per polling district is as follows: Greetland 1221, Sunnybank 505, West Vale 1119. This totals 2,845 properties. As LP0026, LP0177, LP0952 and LP1625 are all in immediate vicinity of Greetland and Sunnybank wards, combined this would see 543 additional new houses built in this distinct community on top of capacity allocated in the 2018 plan. As a percentage of the 3 wards this would see a disproportionate growth of 19% or 22.4% when adding in the 2018 site allocations. It could also be argued that the West Vale Ward is a community in itself (having its own primary school) which would take growth of Greetland and Sunnybank to 31.4% or 33.8% when including 2018 allocations. Previous potential sites which were considered and consequently rejected (report CC37) stated that it would give a "disproportionate increase to Barkisland village". The increase based on the same dataset above would have been 16.6%. which is far less than the huge potential increase of up to 33.8% in Greetland. If this plan was to be passed, surely that would show a great inconsistency in policy and legality regarding planning applications. NPPF (para 133/ 134) also states that aim of Green Belt policy is 'to prevent urban sprawl' and 'to prevent neighbouring towns merging into one another.' The location of this proposed site would go against that ; there would be less clear boundaries between Greetland and Barkisland and the distance from local amenities would become an issue. The Inspector's letter of 16 th July 2019 to the Council notes (para 14) that: ' Local plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.' The site might be 'within a 0-15 minute journey of a town centre; is within 600m of Public Open Space; and within a 15 minute journey to a GP surgery' these simple benefits are irrelevant when it takes into account that the massive increase in traffic from the combined sites will increase travel time substantially, the local GP surgery is full and may no longer be within 15 minutes due to the increase in resulting traffic; that the majority of the public open space is actually part of the local plan to be built on; that the 'cleaner air' that Calderdale is fighting for will be heavily polluted by the increase in traffic and associated pollution from our already crumbling infrastructure. Where are the benefits? NPPF (para 94) also states: 'It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: 28 a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.' Greetland does currently have sufficient school places to meet the needs of the existing community but not for the needs of potentially 600 more families. I can clearly state that no consideration or preparation has taken place to resolve the issue of school places with the local schools and, as our immediate schools are academies, they cannot be forced to expand. The only benefits I can see are short-sighted ways of meeting council targets and lining the

pockets of developers ; no benefits for the existing community or for the people who would live in these houses. Flood areas The NPPF states that planning policies and decisions should promote public safety and take into account wider security and defence requirements by: ' a) anticipating and addressing possible malicious threats and natural hazards... This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area .' As stated previously, LP0026, LP0177, LP0952 and LP1625 must be viewed collectively. Although the land cited on the local plan LP1625 does not flood to the same extent as other sites mentioned, this site soaks up a huge amount of surface water presently and if land above LP1625 was built on, who knows where the water will go. We should not be building on high risk flood areas, or in extremely close proximity to high risk flood areas in Calderdale. We are not like the rest of the country! We are a high risk flood area, within a high risk flood area! The news today (15/2/20) is full of stories of flooding in our area with the army currently in Calderdale trying to prevent a repeat of the devastation from Storm Ciara last weekend. Labour Council leader, Tim Swift, is urging the Government to grant Calderdale urgent assistance by recognising it as a 'Tier 1' authority getting extra funding support because it is one of a small number of areas of the country at "sustained risk" of flooding.' Not a flood risk as stated in the local plan but a flood certainty- an area which will flood repeatedly and has over the last 5 years. Houses built in a high-risk flood area are not sustainable as the NPPF requires them to be. Millions of pounds are already being spent to aid flood prevention and there are numerous reports of houses /businesses not being able to get insurance due to risk of flooding. These are not the types of houses which Calderdale needs. This does not solve the housing crisis ; it just causes Calderdale more problems and costs more money. Conserving and enhancing the historic environment NPPF (para 187) 'predict the likelihood that currently unidentified heritage assets, particularly sites of historical and archaeological interest, will be discovered in the future.' Combined with site LP0177, this area is clearly of historical importance with archaeological finds on this site (post medieval stone skull) and historical buildings on LP0177 (18 th mill). I understand that an archaeological field evaluation would need to take place (in line with NPPF 127) yet no evaluation has been mentioned in the report for the adjacent fields (LP0952). Surely it would be common sense to assume that settlers on these sites during those times would have moved over the wall to the next field! Covering these fields in concrete and houses would not only have a negative impact on the lives of present day inhabitants but would do a disservice to the inhabitants of our past, destroying our local history irreversibly.

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

Duty to Co-operate Reason:

As mentioned previously, Calderdale Council have done nothing to inform residents of the local plan. It could also be argued that listing all four local sites under 'Elland' and the complex method of objection were all strategies to stop residents having their say rather than co-operating with residents.

Suggested Modifications:

Removal of all Green Belt sites (LP0026, LP0177, LP0952 and LP1625) and a revision of brownfield sites for any new and existing opportunities both in our authority and within neighbouring authorities.

Comments:

Additional Evidence Link:

Comment ID **HRU823**

Site ref (if applicable): **LP1625**

Person ID: **958865**

Name: **Mr Andrew Jones**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Although I do not consider myself qualified to say whether or not this proposal to take land out of greenbelt is legally compliant it does seem that rules regarding planning have not been followed with regard to cooperation/consultation. I don't know of anybody who has received any form of information or contact from the council regarding the removal of this land from greenbelt. Everything everyone has learned of this development is via facebook or word of mouth. It all feels like it has all been done 'under the radar' Also, my understanding of the planning framework is that it states that sites to be removed from greenbelt should only be done so under 'exceptional circumstances'. In the case of this development I do not see any exceptional circumstances at all.

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

Sound Reason:

Wildlife - This land which is currently under greenbelt is home to many different species of wildlife. In this plot and the adjacent fields I have seen foxes, rabbits, kestrels and many bats fly around the area. At night owls can also be heard. By removing this land from greenbelt and building on it the natural habitat will disappear and wildlife will suffer Recreation - All of the wildlife above is part of what many people (including myself) enjoy about regularly walking in this local area for pleasure and relaxation. If this land is taken out of greenbelt and developed then that enjoyment and greenbelt will be gone for good Flooding - Although this area is not a part of the flood plain itself, it plays an important part in reducing the rate in which the rainwater travels to the main water course which is the brook in the lower fields. At present the fields soak up the rainwater slowly and then gradually disperse it into the fields below. If this area is developed then the rate of surface water run off would be massively accelerated. There are many houses in the lower Greetland and businesses in West Vale which have recently narrowly avoided flooding in storm Ciara and storm Dennis (the garden centre and Heath rugby club did actually flood). I fear that any further development in this area would increase the risk of flooding further. It could be argued that flood defences could be put in place. However, this would only make the water back up upstream and flood the areas above or increase the flow of water and increase the risk of flooding to the areas below. Traffic - The developments which are proposed along Saddleworth Road which this plot is part of comprises a total of 600 houses to be built. Most households nowadays own a minimum of 2 cars each. This means a minimum of an extra 1200 cars will be using Saddleworth Road. The junction of this road with Stainland Road is already unable to cope with the amount of traffic at peak times. Due to the proximity of buildings to the road and the junction there is no room for road widening, extra lanes, etc. I myself have witnessed many near misses at the traffic lights at this junction caused by the frustration of drivers not being able to progress their journey in reasonable time. Adding extra traffic to this junction would be crazy and irresponsible in my opinion The extra traffic would also create an increased road safety risk for the school and for the residents of Saddleworth Road. Higher numbers of cars would also create considerable extra air pollution to the people of Saddleworth Road, the pupils at the school and the community of West Vale due to the huge queue of traffic which would be backed up the road due to the inability of the junction to cope with the extra traffic. All these cars would be moving at very low speed with their engines idling Urban Sprawl - so many additional house would massively increase the size of Greetland (the figures only show a small percentage increase as Greetland seems to have been classed as the same area as Elland). This is not a true representation of the facts. Greetland is not part of Elland, it never has been. The address is Greetland, Halifax. Services - The local schools are already at capacity and would not be able to take any

more students. The doctors and dentists waiting lists are already stretched and would become unable to cope with extra patients. The NPPF states that land should only be removed from greenbelt in exceptional circumstances and when all other brownfield sites have been used up or considered. There are other brownfield sites in the area such as the mill in west vale which has been demolished or the fan systems site on Rochdale Road which should be looked at before even considering this greenbelt. When I have looked up the other potential sites which have been considered and rejected the reasons given for rejection are words such as 'greenbelt', 'sloping site', 'flooding and drainage issues' and 'no developer on board' The only difference I can see with the above sites compared to those around Saddleworth Road is that there is clearly a developer interested in buying these sites. Just because a developer is on board or interested in these sites does NOT count as exceptional circumstances. They do not care about wildlife or greenbelt, they want greenbelt land because it is easier and cheaper for them to build on. This is NOT exceptional circumstances.

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

Duty to Co-operate Reason:

As I have stated above I have received no form of contact or information from the council regarding the above proposals (and nor has anyone else I know). There has been no cooperation or consultation at all. Word on these proposals has only spread via word of mouth and social media. It feels like the whole process has attempted to be done very much 'under the radar'

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU835**

Site ref (if applicable): **LP1625**

Person ID: **1243415**

Name: **Mr Paul Sutcliffe**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I don't believe building on 'flood plains' can be classed as legal full stop! Please refer to Calderdale's Statement of Community Involvement, which has not been followed in this process. CMBC have already stated "These sites lies within the approved Green Belt. The proposed development does not meet the exceptions, as it does not preserve openness and conflicts with the purpose of including land in the Green Belt. As such, it represents inappropriate development in the Green Belt, which is, by definition, harmful. No very special circumstances have been demonstrated to clearly outweigh the harm caused by the development. It is therefore considered that the proposal would be contrary to NPPF Chapter 13 (Protecting Green Belt Land)"

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

Sound Reason:

LP0026, LP0177, LP0952 and LP1625 are so close in proximity that they should be viewed jointly as well as

individually. They are all in the Greetland ward so why have they been recorded on this plan as Elland.

Main points of objection 1: Flooding 2: Loss of green belt and impact on wildlife corridor 3: Air Pollution and Traffic 4: Infrastructure 5: Urban sprawl Flooding We have seen first-hand the devastation caused by the recent floods (Boxing Day 2015 and 8 th -9 th February 2020). Every proposed site flooded. The upland sites LP0026, LP0952 and LP0952 were rivers, the land already saturated by the vast amounts of natural springs this area has. The lower level part of LP0177 was indistinguishable from the river. The flood plains that these sites provide are critical and flood regularly ; soaking up excess water at times of rainfall, allowing space for the water to flow and be stored on open land in times of flood, even after the river has burst its bank, and protecting land further downstream from potential flooding. The development of this land will increase flood risk further downstream towards Westvale, Elland and Brighouse (Evidence of which can already be seen on Social media sites, Calendar and national news outlets). To develop on these sites would contradict the DEFRA plan and the NPPF. The DEFRA 25year plan states that "National flood management involves the use of a variety of measures including storing water on open land". NPPF 14 (157b) states that plans should work to safeguard land from development that is required or likely to be required for current and future flood management. The current policy and legislation on flooding states - "due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere. Chapter 14, paragraph 163 of the NPPF states: -" When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere It is abundantly clear that any development on these sites would directly oppose all these pieces of legislation and policies and would hugely increase the risk of flooding to both surrounding properties and the wider community in Greetland, West Vale and even as far as Elland. Any development of these sites and reduction in the capacity of these flood plains will only ensure that the flooding we now see will be more frequent and cause even more damage. This is not acceptable or fair therefore these sites should be removed from the local plan. Loss of Green Belt and Wildlife Corridor Calderdale's Green Belt Review map of 2020 clearly shows that all proposed sites in the Greetland ward are 'Most Sensitive Green Belt Parcels'! Does this mean the council disregards its own statements? Esther McVey, our current Housing Minister's written policy on Green Belt land states "protecting the Green Belt goes beyond protection against development" NPPF chapter 13 states that there are 5 purposes to green belt land- CMBC has already stated that this land strongly fulfils these 5 purposes. NPPF ch13 paragraph 143 states "Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances". Protecting the green belt is very important. To include these sites in the local plan goes against all the above policies and there is no evidence of any special circumstances to support development on this land. The sites are a wildlife habitat for many different species. CMBC has already stated that a constraint is that Black Brook running through LP0177 is a UK BAP priority habitat. NPPF Chapter 15 states that planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes and sites of biodiversity. It also states - to protect and enhance biodiversity and geodiversity, plans should: identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including wildlife corridors. Developing these sites will put this precious wildlife corridor and all its inhabitants at great risk directly opposing the NPPF legislation and the DEFRA 25 Year Plan. This site should therefore be removed from the local plan Air Pollution and Traffic Congestion Air pollution and traffic congestion obviously go hand in hand. The junction of Saddleworth Road and Stainland Road in West Vale is already a bottle neck and far too congested and unable to cope with the traffic volume that passes through it on a daily basis. WSP Parsons Brinckerhoff Report on this Transport Network identifies that traffic congestion at the juncture of Stainland Road-Saddleworth Road would increase by approximately 105% traffic congestion at the juncture of Stainland Road-Rochdale Road would increase by over 100% Public Health England (PHE) (11th March 2019) reports that air pollution is the biggest environmental threat to health in the UK, with between 28,000 and 36,000 deaths a year attributed to long-term exposure. There is strong evidence that air pollution causes the development of coronary heart

disease, stroke, respiratory disease and lung cancer, and exacerbates asthma. Professor Paul Cosford, Director of Health Protection and Medical Director at PHE, said: "Now is our opportunity to create a clean air generation of children. Key interventions local authorities can take include redesigning cities so people aren't so close to highly polluting roads." Professor Cosford said: We recommend that at a local level, any new policy or programme of work which affects air pollution should aim to deliver an overall benefit to the public's health. Greetland School and Sunnybank Pre School are right on Saddleworth Road at the boundary of LP0177. The increase in traffic of over 100% and therefore pollution, that will be an outcome of development on this site ignores all the recommendations of PHE and put many people's health at risk especially that of our children which is totally unacceptable. Infrastructure Greetland Primary Academy, West Vale Primary School and Brooksbank High School are all full. With a proposed 600 houses, using Calderdale MBC's figure for school places of .36 per household (IDP section 9.14) this indicates another 206 school places would be needed. Where are these places to be found? Local Dentist has a waiting list of 600 for NHS places. The nearest NHS dentist was recently found (July 2019) 11 miles away in Kirklees. Local GP surgeries are already full. No plans have been put in place to cope with the expected population rise. Waiting times can already go beyond seven days and GP's are already pushed to 'breaking point'. Urban Sprawl The following is from Calderdale Councils website regarding green belt land and urban sprawl: 'Green Belt - The functions of the Green Belt are to: check the unrestricted sprawl of large built-up areas; prevent neighbouring towns from merging into one another; assist in safeguarding the countryside from encroachment; preserve the setting and special character of historic towns; and assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. At what point do you stop building and filling in the gaps? Is the future name of our area going to be called BRIGELLWESTVALEGREETBARKISLAND?

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

Duty to Co-operate Reason:

There are so many constraints and negatives to all these sites that cannot be adequately mitigated against. To develop these sites opposes so many policies, recommendations and pieces of legislation which CMBC appear to have given little or no consideration to. I respectfully ask that these sites are removed from the Local Plan. They should never have been included as they are completely unsuitable for numerous reasons as stated above.

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5608297>

Comment ID **HRU836**

Site ref (if applicable): **1625**

Person ID: **1128772**

Name: **Mrs Marie Louise Murawa**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

There has been a complete lack of consultation prior to formulating and submitting the LP to the Inspector.

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

Sound Reason:

Flooding Highways Ecology Open Space Housing Services Environmental Health Other factors Green Belt  
Flooding With the extensive building already present on Saddleworth Road, the south side already takes the majority of the run-off of rainwater and springs. The proposal to build over six hundred additional dwellings, the majority being proposed on the south side, will cause a problem for the lower valley and West Vale. Whatever drainage is considered suitable will still direct the water to the lower valley and West Vale. Extreme weather conditions that we now seem to experience has shown how devastating the result can be in Calderdale. Highways Saddleworth Road has speed limits ranging from 50 mph, to 30, 20, and back to 30. With blatant speeding in the 30 mph zones, and stationary traffic in the 20 mph zone, at peak times, it is already difficult to navigate. There have been fatalities in addition to other serious incidents. With the prospect of over six hundred additional dwellings and two cars planned per household, Saddleworth Road will become a lengthy car park. There is no prospect of additional employment in the area, so all resident will be obliged to travel to work. Schools are already full subscribed, so would school children be expected to travel to school. Whatever is attempted at West Vale to ease traffic flow, roundabout, slip road, etc., traffic from four directions will still all converge on West Vale. Everyone is also aware that prospects of additional employment in Calderdale is limited, so any new developments on these sites will spawn commuters heading to and from Leeds and Manchester, with both additional pollution and traffic congestion Ecology Currently the valley enjoys the presence of; herons, squirrels, foxes, and other wildlife, who share the area, to the benefit of residents. Open Space Besides supporting farming, and the existing wildlife, the open spaces are enjoyed by walkers, cyclist, horse riders, and many others. They offer mental and physical wellbeing, dilute pollution, and allow vital recreation and exercise. Once greenbelt/open space is lost it will never be returned. Is this the bequest we wish to leave the next generation? The north side of Saddleworth Road has already been over developed. The area has already had a disproportionate level of building for its size. To turn the whole valley into a housing estate would be a travesty. The existing green belt should be allowed to remain, with efforts being made to fulfil the housing requirements with brownfield development. Environmental Health The further addition of possibly 2000 domestic vehicles, which would entail travel to places of employment, education, or social and pleasure, outside the immediate area, would certainly not make for a better environment. Other Factors I have found that Calderdale's publicity surrounding these proposals to have been somewhat limited, and lacking in ensuring complete openness, and robust attempts at consultation with the community. I have found the website difficult to negotiate, and it has on occasion died on me. Calderdale's Local Plan Position Paper reports that there is -"considerable public disquiet over the allocation of land for housing on the south side of Saddleworth Road this disquiet does not seem to be well targeted other than objections to Calderdale MBC" Yes Calderdale MBC should be our first port of call, and if there are other bodies we should -"target" it would be helpful if OUR council made us fully aware of these. I would ask that the Council seriously reviews it's future requirements for housing to ensure that the figures it first submitted are brought up to date. Accessibility Access to and from Saddleworth road is difficult. West Vale is a bottleneck, Stainland road from Saddleworth Road, meanders through some single track country roads, and at Ripponden comes out at a busy T junction. Bus services are very limited, with West Vale being the closest hub. Green Belt Green Belt land has been removed from Local Plan proposals in other areas due to the ribbon effect. Because this is relevant to the land at the south side of Saddleworth Road, it should also be removed, otherwise it smacks of discrimination by Planning. On Calderdale's Local Plan in November 2016 the Green Belt survey for this area came out very strongly, and stated to be a -"highly sensitive area" This Green Belt is currently serving it's purpose;- It continues to be farmland for cattle, sheep, and horses. Helps to safeguard the countryside from encroachment and the merging of neighbouring towns. Helps to emphasise urban regeneration. Additional comments The infrastructure, in respect transport, highways, education, and medical, are totally inadequate for any massive development. Because there are many other areas including Brownfield sites within Calderdale which have not been considered for

inclusion in the in the Local Plan, it smacks of discrimination.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU849**

Site ref (if applicable):

Person ID: **960062**

Name: **Mr Dean McIntyre**

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 previously submitted my concerns regarding the proposed residential developments on the Saddleworth Road, Greetland area when these were initially proposed. Due to living locally, I am concerned at the scale of the proposed developments and the impact that this would have on the local area. I do accept however that there is a requirement for housing as we move forward and that the Greetland area will have to have some further development. I believe that the proposed developments taken together are too much for this area based upon the following. As such I object against each proposal especially when taken as a whole. I accept that smaller scale development in the area as well as other areas in Calderdale is required, but more importantly is sustainable. Less than 150 houses in this area would be a more sustainable. Again the rest spread throughout the District would have less impact throughout the District. My objections regarding some of the proposed developments are similar. The main issue is the scale of development in this corridor. The impact of proposals LP0177(200), LP0952 (246), LP0026 (67) and LP1625(30) which would mean 543 houses being built in the Saddleworth Road corridor would have a significant impact on the amenities in the area as per the below. Traffic Congestion - The junctions of Saddleworth Road, Greetland and Rochdale Road, Greetland where they join Stainland Road, are already congested on a daily basis especially at rush hour. The impact of over 540 houses would be significant. Taking into account, most households have two cars, this would mean over 1000 more cars in this already congested area. This would mean increased traffic at the junctions of Saddleworth Road and Stainland Road, and Stainland Road and Rochdale Road. An increase of 105% and 100 % respectively according to the plan proposals. With this will come increased air pollution and potential increase danger to pedestrians based upon the increase in traffic on Saddleworth Road. Other side roads will be used as -"rat runs" i.e. Sunnybank Drive / Sunnybank Road to Rochdale Road and Brain Royd Lane to Rochdale Road when Saddleworth Road becomes too congested, which will be a daily occurrence if these houses were built. Schools ; A significant expansion of the Greetland Academy would be required to meet the new demand. Based upon the proposals the number of new pupils would be significant. I would suggest the main school site on School Street cannot



be extended much more, which would impact on the Saddleworth Road annex. There is room for school expansion here, but parking is already an issue and would be significantly worse with school expansion. More housing means more children, means bigger schools on limited sites and means more parking issues in both areas. This also means an increased danger to children and residents through inconsiderate parking and driving and using Sunnybank Drive/Sunnybank Road and Brian Royd Lane as a cut through to both schools. Environmental / Flood plain issues ; Site LP 0177 is proposed on a flood plain area. On 9/2/20 the river again broken its bank and the fields are flooding again. Second time in at least 5 years! I have video footage of the significant flooding to this area. This is not a once in a lifetime occurrence, but a now regular occurrence. Site LP 0952 and site LP 1625 on the plans states that these proposed areas are subject to flooding from surface water. I simply cannot understand the logic behind proposals to build houses on areas susceptible to regular flooding. Calderdale is one of the hilliest areas in Yorkshire, so why would there be a proposal to build new houses on a flood plain area and in areas susceptible to excessive surface water issues when there are many other areas within the District that are not susceptible to this and which are not on a flood plain? The cost of the previous flooding and the now recent floods will run into millions for the council and residents. Environmental Factors - Part of the development plan states that environmental protection is a major consideration. I would suggest that development on the scale proposed and in the three areas LP 0952, LP 0177 and LP 1625 would have a significant impact on the local environment and take away the local countryside from local residents. LP 0177 and LP 0952 are wildlife habitats with the latter also being an area of deciduous woodland. LP 0177 and LP 1635 are also archaeological sites of interest. Crime ; At the present time, the Greetland, West Vale and Stainland area is a safe area to live. Crime is relatively low compared to other areas within Calderdale. The addition of over 500 new houses is likely to increase in the local area, which at the present time is relatively low in Calderdale. Such significant developments would attract criminals, both local criminals and travelling criminals. Amenities - Doctors surgeries will be affected with the large increase in patients. Accepting this may expand, I believe that this will still be negative in impact and may not be able to expand to take the increase in people. The impact on local people would be negative. I believe that the surgery is excellent at present and you can access services if required. Other factors ; Green Belt and Housing developers interested ; I have read the rationale as to why some of the previous proposed sites have now been shelved for development. Of note, factors highlighted on most are that they are on green belt sites and that there are no proposed developers interested. Interesting. The proposals in this area are on green belt land and I suspect that money is a factor as to why these areas have yet again been brought back to the table. Greetland is a sought after area, hence the reason why developers would jump at the chance of building houses in this area (more profit), and the council will receive more revenue based upon the housing bands. I am not naive and nor are other people, but this is a concerning factor for myself and no doubt other residents. Is money a factor as to why these proposals have been reinstated, not benefit to the area?

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU872**

Site ref (if applicable): **LP1625**

Person ID: **1128728**

Name: **Mr Vladimir Murawa**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Calderdale have exhibited a complete lack of consultation prior to formulating and submitting their LP to the Inspector. The LP completely disregards NPPF Section 13 Protecting Green Belt Land Paragraph 80.

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

Sound Reason:

The Local Plan is flawed in respect of the following;- Flooding Highways Ecology Open Space Historic Environment Employment Land Study Business and Economy Environmental Health Other factors Accessibility Green Belt Flooding Because of the many natural springs, together with the direct rainfall, the Saddleworth Road area is subject to flooding. Currently the Green Belt and it's trees south of Saddleworth Road absorb much of the excess water, but the lower fields are class 3 flood plains. If the areas south of Saddleworth Road have the massive development outlined in the Local Plan, filling the whole south side, the consequences for West Vale in terms of flooding are dire, as it will all flow down the valley, whatever drainage system might be planned. Calderdale is well aware of the effects of extreme weather in our area. Sewer Flooding The sewers that runs close in the Black Brook and down Saddleworth Road are already overloaded with combined sewer overflows (CSO) that discharge excess flows into the brook at time of rainfall. The proposed developments will more than double the number of houses connected to these sewer systems. These additional foul flows will almost double the flood volumes on the sewers and nearly double the annual spill volumes from the CSOs which will increase the pollution to the brook. This will have a negative impact on the fish and wildlife in the area. The Environment Agency have a no deterioration policy for CSOs but there are no plans to upgrade the sewer system in Greetland and West Vale to negate this impact. Highways Saddleworth Road carries a number of various speed restrictions along it's length. Varying from 20 mph to 50 mph. Traffic at peak times can often be stationary, and speeding within the 30 mph zones is regularly observed. Fatalities and other serious accidents do occur in Saddleworth Road. The proposal for in excess of six hundred homes in Saddleworth Road, and the planned two cars per household, the additional traffic volume would be horrendous. Limited prospects for employment in the immediate area would mean that the two cars per new household would be travelling through Saddleworth Road at peak times to and from their places of work in either Leeds or Manchester, with no economic benefit to Calderdale. However the effects on the pollution level would be horrendous. Because the local schools would not have the capacity for a further one thousand (approximately) children, would this then mean additional travelling from Saddleworth Road to more distant schools? West Vale is currently a serious bottleneck. Whatever plan is devised to try to alleviate traffic congestion, roads from four directions converge into West Vale, and the massive development proposed will only create a far greater problem. Ecology I believe that the ecology of the area is reasonably - "balanced" The valley enjoys the presence of all manner of wildlife including herons, squirrels, foxes, and other wildlife, who share the area, to the benefit of residents. Open Space Open Space preservation is necessary for the following reasons; To continue to support farming, existing fauna and flora of the area. Allow locals and visitors to enjoy the open spaces, namely walkers, cyclist, horse riders, and many others. Open Spaces offer mental and physical wellbeing, dilute pollution, and allow vital recreation and exercise. Once Green Belt/Open Space is lost it can never be returned. Surely we do not wish to deprive the next generation of what little Open Space we have remaining. A great swathe of Saddleworth Road has already been over developed, particularly on the north side. The area has already had a disproportionate level of building for its size. To turn the whole valley into a housing estate would be a travesty. Efforts should be made to fulfil

the housing requirements with brownfield development. The existing green belt should be allowed to remain. Historic Environment The changes to the local areas environment had changed dramatically, and some of the area's historic past has been eroded by the mass urbanisation in the area. We need to preserve what little remains. Employment Land Study The area of Greetland does not have any prospects for meaningful additional employment, meaning new residents would have to travel to places of employment, adding to traffic and pollution problems. Business and Economy Because the area is predominantly agricultural and domestic dwellings, the addition of massive housing development will not change the business prospects or economy of the area. Environmental Health One definition of Environmental Health is -“ Environmental health is focused on the natural and built environments for the benefit of human health, whereas environmental protection is concerned with protecting the natural environment for the benefit of human health and the ecosystem ”. Environmental health and environmental protection are very much related. The loss of Green Belt, Open Space together with the addition of possibly 2000 more domestic vehicles, to enable travel to places of employment, education, or social and pleasure, outside the immediate area, would certainly not make for a better protected environment. Other Factors Other factors I would ask to be considered are; I have found that Calderdale's publicity surrounding their Local Plan proposals to have been very limited, giving the appearance of an absence of complete openness. I do not believe the attempts at consultation with the community have adequate or thorough. Unlike the previous website comments procedure, I have found the website difficult to navigate much less reliable, making it difficult to register comments. Calderdale's Local Plan Position Paper reported that there is -“considerable public disquiet over the allocation of land for housing on the south side of Saddleworth Road this disquiet does not seem to be well targeted other than objections to Calderdale MBC”. Calderdale has also received petitions from the residents of Greetland pointing out their dismay and objections to the initial Local Plan. Perhaps it might be prudent for the Council to review it's more current housing requirements, as a result of changes in national and international situations, together with a brownfield site in West Vale and other areas in Calderdale now becoming available for development. Because the same problems and arguments apply, I would like to add designated areas LP1625, LP0177, LP0026, and LP1407 to my objections. Considering all the areas designated in the current Local Plan for Saddleworth Road, together with the existing development over a long number of years, it would suggest that Saddleworth Road, Greetland appears to have been unreasonably discriminated against, when comparing the areas size for the vast amount of development. The development of brownfield sites should be a priority according to the CPRE, there are more than enough brownfield sites to fulfil the requirements without encroaching into Green Belt. Accessibility Accessibility Access to and from Saddleworth road is difficult. West Vale is a bottleneck, as roads from four directions merge. Stainland road from Saddleworth Road, meanders through some single track country roads, and at Ripponden comes out at a busy T junction. The road is well used by HGVs, servicing Bosch in the valley, Sonoco, and quarries. Bus services are very limited, with West Vale being the closest hub to regular bus services. Green Belt NPPF Section 13 Protecting Green Belt Land Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: 1) to check the unrestricted sprawl of large built-up areas (2) to prevent neighbouring towns merging into one another (3) to assist in safeguarding the countryside from encroachment (4) to preserve the setting and special character of historic towns (5) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Calderdale Council, in its own evidence, concludes that this area of Green Belt performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt. Esther McVey's (former Housing Minister up to Nov 2019) written policy on Green Belt land quotes: “protecting the Green Belt goes beyond protection against development”. The limited area of Green Belt remaining in Greetland should be retained because; Green Belt land has been removed from Local Plan proposals in other areas due to the ribbon effect. Because this is relevant to the land at the south side of Saddleworth Road, it should also be removed, otherwise it smacks of discrimination by Planning. On Calderdale's Local Plan in November 2016 the Green Belt survey for this area came out very strongly, and stated to be a -“highly sensitive area”. It continues to be farmland for

cattle, sheep, and horses. Helps to safeguard the countryside from encroachment and the merging of neighbouring towns. Helps to emphasise urban regeneration. Additional comments In regards to highways, education, transport and medical, the facilities are totally inadequate to be able to sustain any massive development. Much of the Green Belt in the Greetland area has already been consumed by housing development over the years, to a disproportionate degree. Work by CPRE suggests that there are enough brownfield sites in Yorkshire and Humberside to keep councils going for 89 years to meet their 5 year housing targets. It would appear that population growth is likely to be amended substantially downward in view of recent European events. The Local Authority should seriously look again at other possibilities. Alternative proposed use for this site. To remain as Green Belt and open space

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

Duty to Co-operate Reason:

Suggested Modifications:

The Green Belt at Saddleworth Road HX4 should be retained as Green Belt, and existing Brownfield sites planned for housing, as should additional land owned by the council at north Halifax.

Comments:

Additional Evidence Link:

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Comment ID **HRU877**

Site ref (if applicable): **LP1625**

Person ID: **960336**

Name: **Mrs Caroline Wood**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

does not comply with NPPF framework

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

Sound Reason:

Flooding, Loss of Green Belt, Archaeological interest, Urban Sprawl, Infrastructure, Highways, Ecology, Environmental Health

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

Duty to Co-operate Reason:

Building on a flood plain

Suggested Modifications:

leave this area as 'most sensitive Green Belt parcel'

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609101>

Comment ID **HRU881**

Site ref (if applicable): **LP1625**

Person ID: **1243517** Name: **Mr Andrew Mandebura** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

Calderdale Council have failed to make the residents aware of the need to submit new objections to the updated Local Plan and the timescales for this. Calderdale Council has a responsibility to rectify this and ensure this is done in a fair, open, honest and transparent way.

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

Sound Reason:

Infrastructure Section 4.18 of the Cabinet report of 14 October 2019 - "Potential modifications to the draft Local Plan following the receipt of the Planning Inspector's post-stage 1 hearings letter" quotes: - "Exceptional circumstances must be demonstrated to justify the release of land from the Green Belt. Furthermore, careful consideration needs to be given to sites in the Green Belt to ensure that they support sustainable development. In this respect key considerations include the extent which the site would be accessible to existing public and active travel modes, and whether the development would be of sufficient scale to support the delivery of new infrastructure and comprehensive masterplanning." There is currently one bus service, the 343, operated hourly by Yorkshire Tiger which passes along Saddleworth Road and into West Vale. This is invariably a small single decker bus and does not provide a sufficient public transport solution in line with the proposals above. In addition, the current junction in West Vale between Saddleworth and Stainland roads does not adequately handle the current volume of traffic at peak times. This results in long waiting times which will only increase with an increase of additional housing. No changes to infrastructure in this regard have been proposed to handle the additional traffic and this junction will not benefit from the A629 development project. Therefore, I would assert that the neither does this plan support sustainable development or indicate comprehensive masterplanning. Finally, according to Council data on primary school admissions 60 places were allocated to new starters at The Greetland Academy in 2019/20. 33 of these were awarded on distance while 26 were awarded on the basis of siblings already at the school. If the planned admissions are also taken into account at Norland (15), West Vale (26) and Barkisland (30); this brings the total number of new primary school places within the range of the new development to 131. At this stage it has not been detailed how school infrastructure will be developed to cope with existing requirements in addition to the new development which will fall in this catchment area. Once again an indication of a lack of comprehensive masterplanning. As academies West Vale and Greetland are also not bound by the council to expand. Flooding The recent heavy rains brought by Storm Ciara and Storm Dennis have flooded the land proposed for development. Paragraph 149 of the National Planning Policy Framework 2019 states that - "Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk (p.46) and also states in paragraph 150 that new developments should - "avoid increased vulnerability to the range of impacts arising from climate change" The plans as detailed have no reference to the mitigation of flood risk which has shown to be a significant danger as they lie in an area assessed by the Environment Agency to be - "High Risk" Flooding areas - <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map?eastings=408233&northings=421102> The removal of

soil and land which absorbs water to be replaced by concrete and tarmac is likely to exacerbate this issue. Air Pollution As alluded to above. The increased congestion from possibly 1200 additional commuters will lead to a deterioration in the air quality. This will be compounded by the removal of trees for the development. In addition, this decrease in air quality will be right next to a primary school housing young children causing health issues which are well documented such as asthma.

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

Duty to Co-operate Reason:

Given that the Section 110 of the Localism Act sets out the 'duty to co-operate' as sustainable development or use of land that would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a county council requires that councils set out planning policies to address such issues requires that councils and public bodies 'engage constructively, actively and on an ongoing basis' to develop strategic policies requires councils to consider joint approaches to plan making requires that councils and public bodies 'engage constructively, actively and on an ongoing basis' to develop strategic policies I can see no demonstration of a 'duty to co-operate' as this plan does not take into account the issues of school places, traffic congestion and management, environmental issues around flooding and air pollution and their impact. I can see no evidence from the proposals that these have been considered. Also, the economic requirements for the plan have not been reviewed since 2018. During which time inflation has been increasing on average at 2% while wages have stagnated. The economic forecast is therefore outdated and does not represent an ongoing basis of strategic review.

Suggested Modifications:

1. A clear assesment of the impact of additional traffic on current infrastructure and the environment relating to air pollution and the cost of development required to keep traffic congestion at current levels.
2. A robust assesment of the danger of building on a flood plain categorised as high risk by the environment agency and the cost of development to safeguard against flooding.

Comments:

Additional Evidence Link:

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Comment ID **HRU891**

Site ref (if applicable): **LP1625**

Person ID: **1242261**

Name: **Mrs Yvonne Lovatt**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Local residents have not been informed of any of the proposed plans for any of the sites. The revised Calderdale plan was drawn up between 2016-2018 and is no longer fit for purpose. Quote from first minister of Wales on 20/02/2020 There are rigorous planning laws in place and local authorities should not be building on flood plans.LP0026 LP0177 LP0952 LP1625 are ALL FLOOD PLANS>

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

Sound Reason:

GREEN BELT.The land is protected green belt land and creates green open space for the community to enjoy.It is used by walkers and is vital for our health and well being.The land is a wildlife corridor and is home to many species of animals many of which are protected.On the land deers foxes rabbits hedgehogs owls bats and sparrowhawks are regularly seen.The land has trees which are mature and I expect under TPO.There are public right of ways which are well used and should not be lost. FLOODING-The land is a flood plan and have flooded in the boxing day floods of 2015 and most recently during storm Ciara in February 2020.To develop this site will only send the water down to West Vale Elland and Brighouse.Calderdale Council should have a duty to prevent floods happening not be adding to the situations. INFRASTRUCTURE-The amount of houses is disproportionate to the size of Greetland it is a village not a town.The schools are full.Dentists and Doctors are not taking on new patients.The sewers and drains are always over flowing.The traffic lights at West Vale cannot cope with the volume of traffic now let alone if the development goes ahead.The extra traffic will make Saddleworth Road nothing more than a car park with cars idling on the road this will cause more air pollution especially as the cars are regularly stacked right back to the school at peak times.The air pollution will be breathed in by the school children.

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

Duty to Co-operate Reason:

Developers should be made aware of the points every objectors raises and most certainly be informed that all four sites are flood plans,

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU896**

Site ref (if applicable): **LP1625**

Person ID: **1242153**

Name: **Mrs Samantha Connett**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

No the proposal for the site fails to acknowledge many planning guidelines/ advice given on environmental and social factors. Upon reading the national policy planning framework, I have found many points that contradict what the council is trying to enforce, the main one I believe is below. Proposals affecting the Green Belt Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are: a) buildings for agriculture and forestry; b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green

Belt and do not conflict with the purposes of including land within it; c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces; e) limited in filling in villages; f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: "" not have a greater impact on the openness of the Green Belt than the existing development; or "" not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority. The council also failed to make the most affected people aware that these sites have been added back into the local plan when they were removed in 2017. Most people have only found out through social media and word of mouth. Many residents who aren't on social media won't have found out about the need to resubmit their objections to destroying the greenbelt land proposed.

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

Sound Reason:

No Flooding -This site is completely unsuitable for development. It is well known for flooding as it naturally takes all the water that flows from the higher parts of Greetland as well as a large amount of unground springs, seen by myself a week after the floods from storm Ciara on 09/02/2020. The level of devastation caused by this storm in the Calder Valley is only going to become more frequent as we face the battle of climate change, to build houses on such volatile land is completely unthinkable, If this land was developed the risk of the flooding would be devastating as the water usually soaked up by this land would be diverted elsewhere. Over thirty million pounds has so far been spent on flood defences in Calderdale, but as we face the threat from storm Dennis the Army had been called in to help protect us from flood water, but yet the council still wants to build on natural flood plains. Flooding cannot be mitigated against in this area. The land as it stands is helping to prevent further disaster, and must be left as it is to prevent further damage to our homes and community. To risk the homes and livelihoods of the community, when the community is so opposed to it is wrong as it is us who would suffer and end up having to pick up the pieces of our lives when, not if we're left with the repercussions of this development. The proposal does not meet national policy with regards to flooding. The NPPF states in paragraph 155 that "Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere". The recent floods we had on 09/02/2020 only strengthen my point. I will add evidence of the floods on this plot of land below. We are forever having interruption on our roads by the council having to do repairs on the water system, the water going into these as a result of the flood plain being destroyed would put even more pressure on this, leading to more roadworks and more road congestion. Clean Air Policy ; The quantity of houses proposed on this site would mean far greater emissions and air pollution in West Vale, the traffic at the 2 sets of crossroads in West Vale which nearly all driving residents of Greetland will use at least twice daily is stand still traffic at the best of times. the amount of cars this development would bring would only make this worse and drive up the pollutants in the air. Calderdale Council have declared a climate emergency, so how is it a justifiable decision to release greenbelt land and destroying the natural benefits that it brings. There are many more suited brownfield sites within Calderdale that could be used instead. The Green Belt - Loss of large area of Green Belt The NPPF states that para When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused on these grounds alone this site should be removed from the local plan. Taking away something so natural



and therapeutic that benefits local people by getting in touch with nature and to get children out into open spaces should be the last resort and with so many brownfield sites still available I believe this goes against many of the policies on the NPPF. A report recently submitted to the Adult Health & Social Care Scrutiny Board stating the need to retain Green Spaces for the Health and Wellbeing of Calderdale residents. This report was submitted by the Head of Planning. (This report is on Calderdale MBC's Website)

Infrastructure - the roads in and around Greetland are at breaking point on a good day, let alone when we have endless amounts of roadworks to contend with. the roads simply cannot take the proposed number of cars which all of these houses would bring with them. Both The Greetland Academy and West Vale Primary are full to capacity, as well as the feeder high school Brooksbank. Stainland Road Medical Centre would also struggle to attend to the additional patients this would bring with it, the local dentist has a 600 place waiting list for NHS patients. Allocation of land - Greetland is a village. So why is it included in with Elland in the local plan? Ripponden and Brighouse haven't been grouped. I believe this to be a deliberate attempt to mask the disproportionate quantity of building works being allocated to Greetland. while other wards have no sites added to the local plan. I believe this to be an unsustainable amount for this village, put that together with them all on one road and it's unbelievable . LP0026, LP0177, LP0952 and LP1625 are all on Saddleworth Road. Greetland is a community in its own right and when shown the amount of planned build in this one small area it is unacceptable. Greetland is HX4 and a village whereas Elland is HX5 and a town, we shouldn't be grouped together. Urban Sprawl - can cause increased traffic, worsening air and drinking water, threats to groundwater supplies, high rates of polluted runoff and increased flooding. The flooding on 09/02/2020 shows we don't need anymore reason to chance risking more flooding in our area.

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

Duty to Co-operate Reason:

There is no exceptional circumstances that justify destroying the greenbelt land when brownfield sites still remain untouched. It does not conform to Central Government Policy and does not conform with current legislation with regard to building in flood risk areas.

Suggested Modifications:

The total amount of development is unsustainable for Greetland in every way possible, I find it hard to believe someone has put it together. It's also on Greenbelt. this is what it should remain for the future generations of Calderdale to enjoy. The sites LP0026, LP0177, LP0952 and LP1625 should be removed from the local plan

Comments:

Additional Evidence Link:

Comment ID **HRU923**

Site ref (if applicable): **LP1625**

Person ID: **1243675**

Name: **Mr Christopher WALLACE**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

LETTER OF OBJECTION TO PROPOSED HOUSING DEVELOPMENT IN GREETLAND: SITE REF: LP0026 LP0952

LP0177 & LP1625 LOSS OF GREENBELT The NPPF states that very specific circumstances need to be met, I do not believe any circumstances have been met to justify the release of greenbelt for development. The NPPF states brownfield sites need to be identified and the council must demonstrate it has examined all other option for developments prior to the release of greenbelt! The NPPF states that the greenbelt serves to restrict the urban sprawl and safeguard the countryside. The greenbelt woodlands and meadows serve the community for the urban population to enjoy and be part of their wellbeing, nationally obesity is on the increase and the greenbelt is a place for people to exercise, de stress free of charge. The greenbelt is the natural habitats for the varied wildlife in the area. FLOODING With the increased threat of climate change due to global warming it is 100% certain development on his site would increase the risk and requirement of flooding in the area and downstream of the Calder bringing more devastation and misery for the many residents and businesses along the way. The events of December 2015 and February 2020 area perfect example no amount of mitigation can compete with this, millions of pounds have been spent on the failed flood defence scheme and will only serve to divert the problem elsewhere. This area is classed as a high risk floor area and our current Prime minister has urged councils not to release flood plains for development. During the events of February 2020 the British Army were deployed to the Calder Valley to assist with the devastation cause by flood water. INFRASTRUCTURE/POLLUTION/CONGESTION The current road system would not support any increase if the predicted volume of traffic, Saddleworth Road and the traffic lights in West Vale have no room or plans to be altered. Developments of any scale would lead to further congestion and the certainty of increase of air and noise pollution; Calderdale council currently have a clean air policy action plan!! The local plan makes no provisions for child places in all local schools that are currently oversubscribed, this will lead to further congestion an air and noise pollution by been forced to travel out of the area. The schools and care homes along with the houses that boarder Saddleworth Road would be at a increase risk of poorer air quality. Any increase in volume of traffic would certainly increase the risk of accidents particularly around the school area for children, pedestrians and other road users. HOUSING REQUIRMENTS The Greetland area has a disproportionate allocation of land compared to other areas of Calderdale where development would be more suitable for the local plan, areas where the infrastructure is in place, no risk to flooding or causing increased flooding. The local plan needs to be updated and re assessed as to identify the action needed for development as the current plan is old and out of date. Economic ground for the area is not as predicted in the current plan. No plans are in place for business development. The current plan is unsustainable.

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:

Comments:

Additional Evidence Link:

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Comment ID **HRU928**

Site ref (if applicable): **LP1625**

Person ID: **1243715**

Name: **Mr Timothy Wallace**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

LETTER OF OBJECTION TO PROPOSED HOUSING DEVELOPMENT IN GREETLAND: SITE REF: LP0026 LP0952 LP0177 & LP1625 LOSS OF GREENBELT The NPPF states that very specific circumstances need to be met, I do not believe any circumstances have been met to justify the release of greenbelt for development. The NPPF states brownfield sites need to be identified and the council must demonstrate it has examined all other option for developments prior to the release of greenbelt! The NPPF states that the greenbelt serves to restrict the urban sprawl and safeguard the countryside. The greenbelt woodlands and meadows serve the community for the urban population to enjoy and be part of their wellbeing, nationally obesity is on the increase and the greenbelt is a place for people to exercise, de stress free of charge. The greenbelt is the natural habitats for the varied wildlife in the area. FLOODING With the increased threat of climate change due to global warming it is 100% certain development on his site would increase the risk and requirement of flooding in the area and downstream of the Calder bringing more devastation and misery for the many residents and businesses along the way. The events of December 2015 and February 2020 area perfect example no amount of mitigation can compete with this, millions of pounds have been spent on the failed flood defence scheme and will only serve to divert the problem elsewhere. This area is classed as a high risk floor area and our current Prime minister has urged councils not to release flood plains for development. During the events of February 2020 the British Army were deployed to the Calder Valley to assist with the devastation cause by flood water. INFRASTRUCTURE/POLLUTION/CONGESTION The current road system would not support any increase if the predicted volume of traffic, Saddleworth Road and the traffic lights in West Vale have no room or plans to be altered. Developments of any scale would lead to further congestion and the certainty of increase of air and noise pollution; Calderdale council currently have a clean air policy action plan!! The local plan makes no provisions for child places in all local schools that are currently oversubscribed, this will lead to further congestion an air and noise pollution by been forced to travel out of the area. The schools and care homes along with the houses that boarder Saddleworth Road would be at a increase risk of poorer air quality. Any increase in volume of traffic would certainly increase the risk of accidents particularly around the school area for children, pedestrians and other road users. HOUSING REQUIRMENTS The Greetland area has a disproportionate allocation of land compared to other areas of Calderdale where development would be more suitable for the local plan, areas where the infrastructure is in place, no risk to flooding or causing increased flooding. The local plan needs to be updated and re assessed as to identify the action needed for development as the current plan is old and out of date. Economic ground for the area is not as predicted in the current plan. No plans are in place for business development. The current plan is unsustainable.

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:

Comments:

Additional Evidence Link:

Comment ID **HRU934**

Site ref (if applicable): **LP1625**

Person ID: **1243724**

Name: **Miss Timothy Wallace**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

LETTER OF OBJECTION TO PROPOSED HOUSING DEVELOPMENT IN GREETLAND: SITE REF: LP0026 LP0952 LP0177 & LP1625 LOSS OF GREENBELT The NPPF states that very specific circumstances need to be met, I do not believe any circumstances have been met to justify the release of greenbelt for development. The NPPF states brownfield sites need to be identified and the council must demonstrate it has examined all other option for developments prior to the release of greenbelt! The NPPF states that the greenbelt serves to restrict the urban sprawl and safeguard the countryside. The greenbelt woodlands and meadows serve the community for the urban population to enjoy and be part of their wellbeing, nationally obesity is on the increase and the greenbelt is a place for people to exercise, de stress free of charge. The greenbelt is the natural habitats for the varied wildlife in the area. FLOODING With the increased threat of climate change due to global warming it is 100% certain development on his site would increase the risk and requirement of flooding in the area and downstream of the Calder bringing more devastation and misery for the many residents and businesses along the way. The events of December 2015 and February 2020 area perfect example no amount of mitigation can compete with this, millions of pounds have been spent on the failed flood defence scheme and will only serve to divert the problem elsewhere. This area is classed as a high risk floor area and our current Prime minister has urged councils not to release flood plains for development. During the events of February 2020 the British Army were deployed to the Calder Valley to assist with the devastation cause by flood water. INFRASTRUCTURE/POLLUTION/CONGESTION The current road system would not support any increase if the predicted volume of traffic, Saddleworth Road and the traffic lights in West Vale have no room or plans to be altered. Developments of any scale would lead to further congestion and the certainty of increase of air and noise pollution; Calderdale council currently have a clean air policy action plan!! The local plan makes no provisions for child places in all local schools that are currently oversubscribed, this will lead to further congestion an air and noise pollution by been forced to travel out of the area. The schools and care homes along with the houses that boarder Saddleworth Road would be at a increase risk of poorer air quality. Any increase in volume of traffic would certainly increase the risk of accidents particularly around the school area for children, pedestrians and other road users. HOUSING REQUIRMENTS The Greetland area has a disproportionate allocation of land compared to other areas of Calderdale where development would be more suitable for the local plan, areas where the infrastructure is in place, no risk to flooding or causing increased flooding. The local plan needs to be updated and re assessed as to identify the action needed for development as the current plan is old and out of date. Economic ground for the area is not as predicted in the current plan. No plans are in place for business development. The current plan is unsustainable.

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:

Comments:

Additional Evidence Link:

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Comment ID **HRU940**

Site ref (if applicable): **LP1625**

Person ID: **1243732**

Name: **mrs Kathryn Sutcliffe**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I don't believe building on 'flood plains' can be classed as legal full stop! Please refer to Calderdale's Statement of Community Involvement, which has not been followed in this process. CMBC have already stated "These sites lies within the approved Green Belt. The proposed development does not meet the exceptions, as it does not preserve openness and conflicts with the purpose of including land in the Green Belt. As such, it represents inappropriate development in the Green Belt, which is, by definition, harmful. No very special circumstances have been demonstrated to clearly outweigh the harm caused by the development. It is therefore considered that the proposal would be contrary to NPPF Chapter 13 (Protecting Green Belt Land)"

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

Sound Reason:

Has Calderdale Council ruled out all other sites such as Brownfield? Building a further 600 houses in a community of 1760 houses is a rise of 33%, surely this is disproportionate? Is the plan consistent with national policy? No No exceptional reasons to remove Greenbelt status Strains on existing road and junction infrastructure with little planned mitigation for these new proposals Loss of habitat and wildlife Unmeasured impact on air pollution for both the area as a whole and the local primary and preschool sites on Saddleworth Road. These objections are substantiated below to relevant policy. Disproportionate increase to the Greetland Community. - LP26, LP177, LP953 and LP1625 are so close in proximity that they should be viewed jointly as well as individually. Calderdale Infrastructure Delivery Plan 2019, Table 3 shows the Distribution of household growth for 2018-33. It incorporates Elland, Greetland, Stainland and Holywell Green into one group. As such, expected percentage change in household growth is 8.21%. - This fails to give the Inspector a clear image of the distinct communities within our wider area. This is an oversight as the NPPF under Achieving Sustainable Development Section 2, point 8 states a -"social objective" to support vibrant and healthy communities. The Cambridge Dictionary defines community as -"the people living in one particular area" Elland is 2.4 miles from Greetland postcode HX4 8PG and as such should be considered as a separate area. (Apple maps). Looking at the ward map for Calderdale, the community of Greetland should be defined by the interlinking of the Greetland and Sunnybank wards, with the possible inclusion of West Vale. This is due the proximity of the housing in these wards and the significant infrastructure and environmental effect that would be concentrated in this space. See link forward map: [www.calderdale.gov.uk/v2/maps/offices-political](http://www.calderdale.gov.uk/v2/maps/offices-political) Under the Calderdale Review of Polling Districts 2019, the number of properties per polling district is as follows: - Greetland 1221, Sunnybank 505, West Vale

1119. This totals 2,845 properties. - Under additional local site assessment reports LP26, LP177, LP952 and LP1625 are all in immediate vicinity of Greetland and Sunnybank wards. Combined we would see 543 additional new houses built in this distinct community on top of capacity allocated in the 2018 plan. As a percentage of the 3 wards this would see a disproportionate growth of 19% or 22.4% when adding in the 2018 site allocations. - Many locals have further purported that the West Vale Ward is a community in itself (having its own primary school) which would take growth of Greetland and Sunnybank to 31.4% or 33.8% when including 2018 allocations. (<https://www.calderdale.gov.uk/v2/sites/default/files/Returning-Officers-Recommendations.pdf>) Within the Potential Sites considered and rejected report CC37, LP1028, which is also in Greenbelt, had a planned site of 122 dwellings removed. One of the reasons stated is that it would give a "disproportionate increase to Barkisland village". The increase based on the same dataset above would have been 16.6%. If Barkisland can be pulled out of its grouping with Ripponden and Rishworth then we suggest that Greetland can be distinguished from Elland. If 16.6% is disproportionate to one village why is 22.4% or even 33.8%% not disproportionate to another? Perhaps the answer to this is sadly in the other reason why LP1028 has been withdrawn .... lack of interested developer! This shows lack of consistency in application of NPPF policies. Furthermore, The Sustainability Assessment Report for LP26, OBJECTIVE TO CREATE AND RETAIN HEALTHY VIBRANT AND INCLUSIVE COMMUNITIES has been given as 'overall impact is positive as the site is within a 0-15 minute journey of a town centre; is within 600m of Public Open Space; and within a 15 minute journey to a GP surgery'. This fails to take into account that the massive increase in traffic from the combined sites will increase travel time substantially, is reducing open space by building right next to a public footpath where people enjoy the view of open space and the local GP surgery is full and may no longer be within 15 minutes due to the increase in resulting traffic . The Cabinet report on Potential Modifications to the draft Local Plan paragraph 1.4 states that ' a sound Local Plan delivers a sustainable scale and distribution of new homes....whilst protecting and nurturing our environment'. - This scale of distribution (22.4-33.8%), within one village community, is not sustainable given the infrastructure shortfalls of traffic, schooling and other services. - The Sustainability Assessment reports for all 4 LPS for OBJECTIVE 5 TO IMPROVE ACCESSIBILITY TO ESSENTIAL SERVICES, FACILITIES AND EMPLOYMENT have been marked as positive yet they all note the risk of demand on existing services whilst not making plans for mitigation. - This also contradicts the purpose of Greenbelt to restrict urban sprawl (paragraph 134 NPPF) and would also decimate 23.74 hectares of Greenbelt with no exceptional circumstances given (measurements taken from Local Plan Assessment Reports). - This also contradicts the purpose of Greenbelt to -“ assist in safeguarding the countryside from encroachment”- All 4 LPs against The Sustainability Assessment of OBJECTIVE 13 TO ENSURE EFFICIENT USE OF LAND have been marked negative as it is all greenbelt. - Whilst we may be 'close' to transport investments (paragraph 1.5 Potential Modifications report) such as the A629 and potential Elland station etc the fact remains that most people will get in a car to get to these links. The only way to do this is via the 2 bottleneck crossroads in West Vale. - Graphs found on city ward explorer shows Greetland and Stainland as already having the highest percentage of cars per household in Calderdale at 84%. Equally it also shows that the average distance travelled to work is 13.2km. - By creating more houses in this area it will only add to congestion and air pollution which will not assist the council in reducing the Green House Emissions noted in paragraph 4.15. Nor does it support the councils wish in paragraph 4.2.1 to reduce car use. Additionally. Paragraph 103 of the NPPF states -“ 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 transport modes. This can help to reduce congestion and emissions, and improve air quality and public health”- There are no immediate plans for economic employment growth in Greetland hence no limiting of travel to the additional proposed 543 dwellings. In all likelihood we will see a significant increase in car usage as existing buses that service west Greetland are small and infrequent. - The LP is also over 2km from a railway station. NPPF Paragraph 108 states that -“in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: a) appropriate opportunities to promote sustainable transport modes can be ; or have been ; taken up, given the type of development and its location; - The location of the site in an out of town Greenbelt area lends itself to car use - 84% of this

population own a car. b) "safe and suitable access to the site can be achieved for all users;" - The Sustainability Report for LP26, Objective 2 to improve safety and security, shows an uncertain outcome hence this has not been ensured. The junction of Scar Bottom Lane and Gate Head Lane which are most directly effected by LP26 and LP952 is not adequately mitigated. In order to accommodate the resulting traffic and proposed roundabout the road would need to be widened, thus removing trees under Tree Preservation Orders. There would also be a knock-on effect of danger to the top entrance of Brian Royd Lane. This lane (as an extension to the lower part of Scar Bottom Lane) has restricted visibility and is already used as a cut-through. This will only get worse. - Equally, no mitigation had been put in place to improve road safety outside Sunnybank Preschool and Greetland Academy which is already frightening at peak times of day with school traffic, tractors and Sonoco HGVs. - Calderdale are also planning the creation of an A58 Ripponden HGV Turning Circle. This has a significant impact on the Greetland area as it will encourage HGVs onto Saddleworth Road. I picture a mini roundabout at the bottom of LP26 with HGVs coming from the west, SONOCO trucks from the east, the local bus from the north .... oh and hundreds of new residents and the usual tractors! This is not safe or suitable access! - NPPF Paragraph 111 states - "All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed" - I ask the council to define 'significant amounts of movement' and ask do the sites combined represent significant amounts of movement and has a travel plan for these combined developments been or needs to be generated? Major development is defined as: - "For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more" - I suggest that the combined LPs area of 23.7 hectares will lead to significant movement. In order to be 'sound' and in accordance with the NPPF the plan should be positively prepared 'on a strategy which seeks to meet objectively assessed development and infrastructure requirements'. - With reference to the Calderdale Infrastructure Delivery Plan, Table 5: Congested Locations and Associated Funding Opportunities, the location of Stainland Road/Saddleworth road is considered and notes "upgraded signal improvement and localised traffic management needed". - This will be woefully inadequate for potentially 1000 extra cars as evidenced by the outburst of laughter at a community meeting when suggested that signalling upgrades enough would be sufficient. In fact WSP Parsons Brinckerhoff Report on Transport Network states traffic congestion at the juncture of Stainland Road-Saddleworth Road would increase by approximately 105%. The junction is already maxed out. - The infrastructure plan also highlights investment needed in West Vale and buses given priority. However, many of the bus stops in Greetland are unsafe, based on opposite sides of the road and are on routes which are too narrow so a complete overhaul of the bus infrastructure would be needed to accommodate this many people. - I do not feel that an adequate infrastructure plan is in place for this level of growth in one village community. The lack of infrastructure also contradicts paragraph 72 of the NPPF: NPPF 72. "The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:" - Calderdale does not have the support of the Greetland Community, only that of a couple of individual landowners and private developers. 33.8% is a 'significant extension' and we have not seen a thorough investigation of infrastructure requirements at a level local to Greetland. "a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains; " - With the destruction of 23.74 hectares of Greenbelt there will be no environmental gains, only significant losses to wildlife. The areas covered by LP26, LP177, LP952 and LP1625 represent a wildlife corridor home to deer, badgers, bats, owls, herons and many more species. "b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which

there is good access,, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations)" - As a community we have seen no plans for sufficient access to services. The local school, doctors, dentists etc are full! A community should not be grown to the extent stated above without mitigation certain and planned. - The Calderdale Sustainability Report for Option 4 shows uncertain impact for accessibility to essential services. Also, the sites are more than 2km from a railway station and have limited bus services and thus access to sustainable forms of transport. This also goes against policy guidelines. Flooding - I also question the ability to build quickly on LP26, LP177, LP952 and LP1625 due to local flooding issues. Many of these issues occur further up the hill in Upper Greetland with natural spring water that flows from Norland. There are ample cases where spring water has been diverted either naturally or due to building works and this then has a knock on effect on to the LPs states. This is often due to water that has been diverted due to building higher up and insufficient up-keep of pipes on private land. - In addition to surveyance of LP26, LP177, LP952 and LP1625 a full investigation of the water flows throughout Greetland needs to be conducted. LP26, LP177, LP952 and LP1625 act as a flood plain for the whole hillside. Building on these run-off areas should not start until the knock-on effect has been calculated for the whole village. - Indeed, this links to information on the Planning Portal PPS15: Planning and Flood Risk which states "B10 New development, whether building works, engineering operations or changes in land use, can increase flood risk. Most simply, siting a building within an area likely to flood will increase the direct risks to that building. The greater the quantum of construction, the greater the consequences of a flood event are likely to be. While the direct consequences of flooding for a building are generally readily identifiable, less obvious but equally significant indirect impacts can be caused elsewhere. <https://tinyurl.com/vyeaxrr> Is the council satisfied that indirect impact of flooding elsewhere in the area has been adequately assessed and risks mitigated? - The Sustainability Assessment report for LP26, OBJECTIVE 7 TO REDUCE THE RISK OF FLOODING AND RESULTING DETRIMENTAL EFFECTS ON PEOPLE AND PROPERTY is reported as Uncertain. 'Overall the impact on this SA Objective is uncertain, and any impact will be dependent on the design of any future development and any mitigation measures.' How can land be released when a full risk assessment has not been carried out? - LP177 has a negative outcome for this objective. NPPF paragraph 91 states "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." - Building on LP26, LP177, LP952 and LP1625 would have a detrimental effect on healthy lifestyles of the Greetland Community. These open spaces are often used for walking. The effect of existing open space on the community's mental wellbeing is also important. The World Health Organisation on its own website states: "Green spaces also are important to mental health. Having access to green spaces can reduce health inequalities, improve well-being, and aid in treatment of mental illness. Some analysis suggests that physical activity in a natural environment can help remedy mild depression and reduce physiological stress indicators." <https://www.who.int/sustainable-development/cities/health-risks/urban-green-space/en/> NPPF 94. "It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education." - The current capacity of Greetland Academy on a split-site is well suited to the size of village. Currently, children within the village can access the school with intake occasionally taken from some surrounding villages. If over 600 new houses are built then a situation will arise in which demand will outweigh supply, families who live in Upper Greetland, and even close to the KS2 site, will be forced to leave the village and drive to other schools to find a place as they will no longer be in the catchment area. Greetland Academy is already a 2 class intake. This enables it to maintain a village school atmosphere. As an Academy this school cannot be forced to expand so where is the plan for additional school places? NPPF Paragraph 117 states - "Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating



objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land" - Is the Inspector satisfied that Calderdale has fully investigated all brownfield sites for housing purposes? Residents are not convinced this is the case! Greenbelt is being destroyed because developers are more interested in building on it! - The inclusion of this number of homes along Saddleworth road will significantly increase air pollution and I would challenge Calderdale Council to model this effect in order to understand true mitigation. This is especially serious as the location is so close to a primary school and a preschool. The locations of these schools are on the main road and at water level. We have seen no modelling of the potential increase in harmful emissions that I am aware of and the effect this would have not only on the wider community but vulnerable school children. - The NPPF under paragraph 170e highlights that new developments should not add to air pollution. Increased car usage from over 600 new houses will lead to increased air pollution. Objective 10 in The Sustainability Assessment reports for all of these LPs in Greetland has been marked uncertain and hence these plans are not necessarily in coherence with the NPPF because the plan does not ensure that there will not be an increase.

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

Duty to Co-operate Reason:

There are so many constraints and negatives to all these sites that cannot be adequately mitigated against. To develop these sites opposes so many policies, recommendations and pieces of legislation which CMBC appear to have given little or no consideration to. I respectfully ask that these sites are removed from the Local Plan. They should never have been included as they are completely unsuitable for numerous reasons.

Suggested Modifications:

All these sites should be removed from Calderdale plans and be replaced with potential brown field sites in accordance with government policy.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609519>

Comment ID **HRU944**

Site ref (if applicable): **LP1625**

Person ID: **1243746**

Name: **Mr Samuel Sutcliffe**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I don't believe building on 'flood plains' can be classed as legal full stop! Please refer to Calderdale's Statement of Community Involvement, which has not been followed in this process. CMBC have already stated "These sites lies within the approved Green Belt. The proposed development does not meet the exceptions, as it does not preserve openness and conflicts with the purpose of including land in the Green Belt. As such, it represents inappropriate development in the Green Belt, which is, by definition, harmful. No very special circumstances have been demonstrated to clearly outweigh the harm caused by the development. It is therefore considered that the proposal would be contrary to NPPF Chapter 13 (Protecting Green Belt Land)"

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

Sound Reason:

LP0026, LP0177, LP0952 and LP1625 are so close in proximity that they should be viewed jointly as well as individually. They are all in the Greetland ward so why have they been recorded on this plan as Elland.

Main points of objection 1: Flooding 2: Loss of green belt and impact on wildlife corridor 3: Air Pollution and Traffic 4: Infrastructure 5: Urban sprawl Flooding We have seen first-hand the devastation caused by the recent floods (Boxing Day 2015 and 8 th -9 th February 2020). Every proposed site flooded. The upland sites LP0026, LP0952 and LP0952 were rivers, the land already saturated by the vast amounts of natural springs this area has. The lower level part of LP0177 was indistinguishable from the river. The flood plains that these sites provide are critical and flood regularly ; soaking up excess water at times of rainfall, allowing space for the water to flow and be stored on open land in times of flood, even after the river has burst its bank, and protecting land further downstream from potential flooding. The development of this land will increase flood risk further downstream towards Westvale, Elland and Brighouse (Evidence of which can already be seen on Social media sites, Calendar and national news outlets). To develop on these sites would contradict the DEFRA plan and the NPPF. The DEFRA 25year plan states that "National flood management involves the use of a variety of measures including storing water on open land". NPPF 14 (157b) states that plans should work to safeguard land from development that is required or likely to be required for current and future flood management. The current policy and legislation on flooding states - "due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere. Chapter 14, paragraph 163 of the NPPF states: -" When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere It is abundantly clear that any development on these sites would directly oppose all these pieces of legislation and policies and would hugely increase the risk of flooding to both surrounding properties and the wider community in Greetland, West Vale and even as far as Elland. Any development of these sites and reduction in the capacity of these flood plains will only ensure that the flooding we now see will be more frequent and cause even more damage. This is not acceptable or fair therefore these sites should be removed from the local plan. Loss of Green Belt and Wildlife Corridor Calderdale's Green Belt Review map of 2020 clearly shows that all proposed sites in the Greetland ward are 'Most Sensitive Green Belt Parcels'! Does this mean the council disregards its own statements? Esther McVey, our current Housing Minister's written policy on Green Belt land states "protecting the Green Belt goes beyond protection against development" NPPF chapter 13 states that there are 5 purposes to green belt land- CMBC has already stated that this land strongly fulfils these 5 purposes. NPPF ch13 paragraph 143 states "Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances". Protecting the green belt is very important. To include these sites in the local plan goes against all the above policies and there is no evidence of any special circumstances to support development on this land. The sites are a wildlife habitat for many different species. CMBC has already stated that a constraint is that Black Brook running through LP0177 is a UK BAP priority habitat. NPPF Chapter 15 states that planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes and sites of biodiversity. It also states - to protect and enhance biodiversity and geodiversity, plans should: identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including wildlife corridors. Developing these sites will put this precious wildlife corridor and all its inhabitants at great risk directly opposing the NPPF legislation and the DEFRA 25 Year Plan. This site should therefore be removed from the local plan Air Pollution and Traffic Congestion Air pollution and traffic congestion obviously go hand in hand. The junction of Saddleworth Road and Stainland Road in West Vale is already a bottle neck and far too congested and unable to cope with the traffic volume that passes through it on a daily basis. WSP Parsons Brinckerhoff Report on this Transport Network identifies that traffic congestion at the juncture of Stainland Road-Saddleworth Road would increase by

approximately 105% traffic congestion at the juncture of Stainland Road-Rochdale Road would increase by over 100% Public Health England (PHE) (11th March 2019) reports that air pollution is the biggest environmental threat to health in the UK, with between 28,000 and 36,000 deaths a year attributed to long-term exposure. There is strong evidence that air pollution causes the development of coronary heart disease, stroke, respiratory disease and lung cancer, and exacerbates asthma. Professor Paul Cosford, Director of Health Protection and Medical Director at PHE, said: "Now is our opportunity to create a clean air generation of children Key interventions local authorities can take include redesigning cities so people aren't so close to highly polluting roads." Professor Cosford said: We recommend that at a local level, any new policy or programme of work which affects air pollution should aim to deliver an overall benefit to the public's health. Greetland School and Sunnybank Pre School are right on Saddleworth Road at the boundary of LP0177. The increase in traffic of over 100% and therefore pollution, that will be an outcome of development on this site ignores all the recommendations of PHE and put many people's health at risk especially that of our children which is totally unacceptable. Infrastructure Greetland Primary Academy, West Vale Primary School and Brooksbank High School are all full. With a proposed 600 houses, using Calderdale MBC's figure for school places of .36 per household (IDP section 9.14) this indicates another 206 school places would be needed. Where are these places to be found? Local Dentist has a waiting list of 600 for NHS places. The nearest NHS dentist was recently found (July 2019) 11 miles away in Kirklees. Local GP surgeries are already full. No plans have been put in place to cope with the expected population rise. Waiting times can already go beyond seven days and GP's are already pushed to 'breaking point'. Urban Sprawl The following is from Calderdale Council's website regarding green belt land and urban sprawl: 'Green Belt - The functions of the Green Belt are to: check the unrestricted sprawl of large built-up areas; prevent neighbouring towns from merging into one another; assist in safeguarding the countryside from encroachment; preserve the setting and special character of historic towns; and assist in urban regeneration, by encouraging the recycling of derelict and other urban land'.

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

Duty to Co-operate Reason:

Under the Localism Act 2011, Section 33A "Duty to co-operate in relation to planning of sustainable development", Paragraph 3 lays out the duties required of the local council of which points a and b require preparation of local plans. Point d however calls for "activities that can reasonably be considered to prepare the way for activities within any of paragraphs (a) to (c) I question if Calderdale has sufficiently carried out all activities needed to form a sustainable local plan with specific reference to show that release of Green Belt in LP26, LP177, LP952 and LP1625 meets exceptional circumstances?: - i.e. has all brownfield been explored as per NPPF paragraph 137? Has land recently regraded to brownfield on LP177 at the end of Ellistones Lane, and pending vacation of the Freudenberg factory now up for sale) been considered? It is CPRE's view after meeting local residents that they consider these brownfield sites broadly positive. - I also question if there has been adequate exploration of infrastructure requirements and mitigation for a 33.8% growth in a community? -The council has provided a Sustainability Appraisal Report. However, under preferred Option 4, 9 of the 17 objectives analysed have been marked as - "uncertain" Impact. I question how fully the necessary 'activities' needed to form a sustainable plan have been carried out? e.g. risk assessment and necessary mitigation. How can a plan be sustainable and Green Belt destroyed when there are so many question marks?

Suggested Modifications:

All these sites should be removed from Calderdale plans and be replaced with potential brown field sites in accordance with government policy.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609558>

Comment ID **HRU949**

Site ref (if applicable): **LP1625**

Person ID: **1243763**

Name: **Miss Gillian Reid**

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:

Having lived in Greetland since birth (now aged 36) I have seen many changes in our village over the years. None of which I have ever felt compelled to write an official objection to up until now. After seeing the plans LP0177 (Land adjacent Ellistones Place) I am shocked to hear along with other plans LPO952, LPO026 AND LP1625 the enormous amount of building work being planned for such a small, beautiful village. If these plans are to proceed, I feel our local area will become completely unrecognisable as the small and beautiful village we once were. Please find below the reasonings behind my strong objections to this. The reasons are vast so for ease I have split the factors into the following categories: 1.Environmental 2.Economic 3.Social Environmental The plans for LP1625 along with LP0177, LP0026 and LP0952 all cover our valuable Greenbelt land in Greetland. This land is classified as a 'most sensitive' greenbelt, please find evidence of this in the following link to the Councils Greenbelt Review: [https://calderdale.gov.uk/v2/maps/green-belt-review?fbclid=IwAR0-YtEHRsU5\\_gSN2JMA4zPU97P0GPsWU0\\_lq263NGHjCx4\\_m66ibHv8vaQ](https://calderdale.gov.uk/v2/maps/green-belt-review?fbclid=IwAR0-YtEHRsU5_gSN2JMA4zPU97P0GPsWU0_lq263NGHjCx4_m66ibHv8vaQ) I simply can not see how the amount of proposed building work (600 homes through the 4 aforementioned sites) can possibly be justified on this beautiful Greenbelt land. This land provides a wildlife corridor, contains a public right of way and reduces the flood potential of not only our own local area but for those downstream of us and is meant to include prevention of urban sprawl. To build on this land will destroy all of these benefits this Greenbelt area offers to both the wildlife and the local community. The Department for Environment, Food and Rural Affairs' (DEFRA) 25-year plan states ' we will protect ancient woodlands and grasslands, high flood risk areas and our best agricultural land' . To build on this site would go be going directly against this statement. There is plenty of wildlife to be seen in and around LP1625, this plan would take away their natural habitat which is crucial to their survival, how can we justify taking away these species homes when we have already taken so much from them and are not doing enough with the land we have already taken. In June 2016 The CMBC published their Local Risk Management Strategy. This document states -"It is the local flood risk management strategy's main objectives to take steps to reduce flood risks in Calderdale" One of the ways they proposed to do this was to -"develop a land management strategy that will potentially reduce upland runoff" The proposed building on any of the Greenbelt land will only exacerbate any runoff and flooding on lower lying land and further down the valley i.e. West Vale and Elland. We only have to look at our surrounding areas and effects that floods have on them. For example, Sowerby Bridge and Hebden Bridge. I fear that this development will cause similar tragic situations where businesses and homes of local residence are ruined with the clean-up/prevention bill costing millions. Why would we want to add to this problem when we are working so hard to find solutions to it in other local communities. Our natural land is already preventing this from becoming a problem for many, why not let this continue? Storm Ciara struck Calderdale with further flooding on 09/02/20 flooding many of the same places as Boxing Day 2015, this is evidence that the area floods more frequently than 'once a century'. The flood plains in this area did their job by decelerating the flow of water down the valley, I dread to think of

the outcomes had this land been built on at the time. The CMBC Flood strategy was born following the Boxing Day floods of 2015. Calderdale was the worst affected borough in the UK. Greetland saw localised flooding all along the flood plain (sites LP0952 and LP0177 ) and the Black Brook. The houses on Woodfield Drive were affected. Multiple sites in West Vale were affected and further downstream the Elland Bridge collapsed and with that a massive Â£4 million repair bill. Building on our Greenbelt land will only lead to worse flash flooding as this land helps slow the flow of water to the main watercourses. Current legislation on building on flood risk areas can be found here: <http://www.environmentlaw.org.uk/rte.asp?id=105> This contains the following quote 'new development in the flood risk areas would only be allowed when it is exceptionally necessary' I find it very hard to believe it to be 'exceptionally necessary' to build 600 homes in this space when there are plenty of other areas of either brownfield or less sensitive to flooding which can be considered first. A quick look at the website Right Move will show you there are approx. 600 homes for sale within a 3-mile radius of these sites. Whilst these homes are available for anyone wishing to move to the area why is it 'exceptionally necessary' that we build 600 more? To me this only indicates that the demand for houses in this area may not be as high as perceived by CMBC and therefore we do not need to develop on any more of our precious land. Economic As of 31/01/20 the UK is in a Brexit transition period, leaving us with uncertainty for our future economic prospects. The plans for LP1625 and the other 3 mentioned sites have been proposed prior to Brexit and the forecast on population growth rates. This means the plans are already out of date as until this transition period is complete and we know more about our relationship with Europe and the rest of world how can we know how many new homes we may or may not see a need for? Would it not be better to put these plans on hold until we know the outcomes and needs, instead of building for the sake of building? The current roads around Greetland already struggle with the amount of traffic seen through the village and into the already chronic traffic issues of Westvale. Adding a further 600 homes to this already growing problem is only going to make matters worse. I can't even begin to imagine what another potential 600+ cars going through west vale would look like, other than just a complete standstill. The daily struggle to get in and out of Greetland especially at peak times will only be added to. At peak times of school drop off and pick up Saddleworth Road already becomes an absolute nightmare, I'm not sure how the road would physically cope with even more children needing access this school site. The number of vehicles in the road space along with the terrible parking that often occurs around school pick up zones is already an accident waiting to happen, do we really need to add to the danger by adding even more people to the mix? Also, with the added traffic spending much more time standing still with lengthy delays this will all contribute to poor air quality especially around our schools. Is this really what we think will be best for our local children? The area already struggles with the condition of the local roads with the current level of traffic. Why are we not addressing these problems before adding to them? If the council's budget for road maintenance can not stretch to repairing the damage by the current level of traffic where is the sense in adding a further 600+ cars to the road? With a lack of capacity for NHS dentists in the area, adding a further 600 homes is only going to increase the number of people with poor oral health due to lack of local availability. There will also be a strain on the local GP surgeries where it is already difficult to get an appointment for many. Social This greenbelt land gives people chance to enjoy nature whilst contributing to both their physical and mental wellbeing. Surely taking away part of these stunning surroundings will have a negative impact on the health and quality of life of those who enjoy it regularly. The air will be more polluted, stress and anxiety levels will increase due to fear of further flooding, and there will be an increase in hospital admissions due to insufficient numbers of GP appointments.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU955**

Site ref (if applicable): **LP1625**

Person ID: **1243615**

Name: **mrs SAMANTHA mcfadzean**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

There were no working party meetings ahead of the Councils Cabinet Meeting of 4th October 2019 at which the decision to increase the housing numbers was made. The local Councillors were therefore prevented from discussing the issues ahead of the cabinet meeting. The local Plan does not address the implications of the National Planning Policy Framework, especially NPPF Para 177 and the associated PPG in the sustainability of Greenbelt Sites. For example under this site assessment it shows out of 17 sustainability assessments, this allocation has 10 uncertain and 1 negative Assessment.

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

Sound Reason:

The council has failed to differentiate between housing need and requirement as it has not evidenced its economic and employment growth forecasts. The plan has a grossly disproportionate emphasis on the Greetland community, with the 600 proposed houses off Saddleworth road. This is neither fair, reasonable or a balanced share to Greetland's size. The plan would create Urban Sprawl in our area which would have many negative consequences for Residents, Local Businesses and the environment. Such as: Traffic - We already have a traffic congestion issue on Saddleworth Road, Rochdale Road and Stainland Road at key times, this plan would just exacerbate these problems. Air Pollution - the increase in traffic will lead to an increase in air pollution, particularly affecting the elderly and young children, the latter of which attend the infants school located on Saddleworth Road below the sites included in the Plan. Infrastructure - The local School, GP and Dentist have no capacity to service the increased number of residents the Plan will create. There would need to be significant investment in Infrastructure however there is no provision in the Infrastructure Delivery Plan for the expansion of primary school places in Greetland and only an additional 75 secondary school places which is totally inconsistent with the NPPF guidelines. The council has failed to provide evidence as follows: Building houses on this plot would extend the built up area of Greetland and undermine the objectives of the Green Belt. It would also contribute to the extension of Greetland towards West Vale compromising Greetland as a Community, thus creating Urban Sprawl! Highways - The Council in its draft Infrastructure Delivery Plan it states 'There is no need to provide improvements to the West Vale junction.' I do not know how they have come to this conclusion. The current traffic problems encountered in this area cause a huge bottle neck of traffic at key times, the traffic lights are currently running at 117% and the maximum they should be running at is 93%! How can the plan to add 600 houses to Saddleworth Road not require improvements? Environmental Health - The Council claims it will mitigate against the environmental impact of increased Noise and Air Pollution but does not state how it will do this! We have significant concerns about the way in which the process of producing the Local Plan has been conducted. Not enough effort has been made to communicate the process of the Local Plan to residents and raise awareness of the consultation. The Greetland Pressure Group which was set up by the residents of Greetland to raise awareness of the Local Plan in our area have given us more consultation in the last 3

weeks than the Council themselves. Due to their efforts our area has been on Calendar and Look North focusing specifically on the flood problems these areas of green belt have incurred. The Council has not made it clear what they will do to make the Plan compliant. Mo

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

Duty to Co-operate Reason:

We have significant concerns about the way in which the process of producing the Local Plan has been conducted. Not enough effort has been made to communicate the process of the Local Plan to residents and raise awareness of the consultation. The Greetland Pressure Group which was set up by the residents of Greetland to raise awareness of the Local Plan in our area have given us more consultation in the last 3 weeks than the Council themselves. Due to their efforts our area has been on Calendar and Look North focusing specifically on the flood problems these areas of green belt have incurred. The Council has not made it clear what they will do to make the Plan compliant.

Suggested Modifications:

Exclude LP1625 from the local plan.

Comments:

Additional Evidence Link:

Comment ID **HRU960**

Site ref (if applicable): **LP1625**

Person ID: **1243806**

Name: **mr andrew jackson**

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:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609643>

Comment ID **HRU969**

Site ref (if applicable): **LP1625**

Person ID: **1241940**

Name: **Mrs Goda Pateman**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I refer you to the Calderdale Statement of Community Involvement 2015, section 1.2. This section calls for clarity. Many residents of Greetland were unaware of the proposed new allocations ; there was not enough effort on the Council's side to ensure that every resident of Greetland was informed of the Local Plan. People will only be clear, and understand what will happen to their neighbourhood if they are properly and clearly informed. For example: it's unreasonable of the Council to assume that the residents of Greetland would automatically check folder 10 ; Elland Additional Housing Sites. Each of the proposed sites are marked as This statement does not add to clarity. These fields are Greenbelt. Sustainability Appraisal Report ; I refer here to option 4: of the 17 objectives analysed, nine of them have been marked as UNCERTAIN More than half. Were the objectives thoroughly analysed and the findings inconclusive, or were they not analysed thoroughly enough so as to give a conclusive answer? The statement ' UNCERTAIN impact' covers both of the above scenarios. This does not add to clarity.

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

Sound Reason:

Has the council Considered the impact of Brexit on the UK's economy? Ruled out all other sites which are less sensitive? Been in talks with neighbouring authorities and asked if they have any potential sites? Considered the impact such a large development would have on the village of Greetland? Considered the direct and indirect impact of flooding on residents and businesses in Greetland, West Vale and Elland and beyond? Considered negative impact of urban sprawl, such as loss of farmland and wildlife, increased car use and neglect of older towns? Additionally: There are no exceptional reasons to remove greenbelt status. Greenbelt spaces were designated to reduce urban sprawl, safeguard the countryside and historic towns, and encourage urban regeneration. The proposed LP fails on all those Disproportionate growth of Greetland community. Table 3 of of the Calderdale Infrastructure Delivery Plan 2019 shows the distribution of household growth for 2018-2033. It covers Elland, Greetland, Stainland and Holywell Green in one group. The household growth for the whole area is about 00% , the household growth for Greetland is almost 34%. The Council's decisions are not consistent with what a permissible increase to a community should be: report CC37, LP1028 (Greenbelt) had a planned site for 122 dwellings removed. One of the reasons given was 'disproportionate increase to Barkisland village'. If 16.6% I disproportional to one village then why is an increase of over 22% or even 33.8% not disproportionate to another? This shows a lack of consistency in the application of NPPS policies. Paragraph 103 of the NPPF : 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 transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. The proposed development almost invites the need to travel by motor vehicle and therefore increases the congestion and gas emissions. Direct and indirect impact of building on floodplains. The proposed development will have a significant detrimental impact on flooding. The run-off into Black Brook will cause serious downstream effects, for example the floods of 9 th February 2020 saw Greetland Cricket Club, Heath Rugby Club and Clayhouse Park all under water. How can any flood plan mitigate against the risk of even more severe flooding in West Vale and Elland leading to major issues for all the businesses and residents? The local wildlife which is diverse and rich, will be decimated by any further development. Loss of public space. The Council should encourage Calderdale residents to spend leisure time on their doorstep, thereby reducing congestion and emissions generated by car journeys. In this way, public spaces and greenbelt areas would be protected and the wellbeing of residents preserved.



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

Duty to Co-operate Reason:

Calderdale have failed to consult residents in open and fair manner regarding the proposed development

Suggested Modifications:

Greenbelt should remain greenbelt. Calderdale Council should seek more creative solutions to repurpose unused and derelict spaces to avoid urban sprawl and avoid creating a doughnut effect. Proposed plans LP0026 (The Gate Farm), LP0177 (Land adjacent Ellistones Place), LP0952 (Land at New Gate Farm) and LP1625 (Land to the west of Silverdale Terrace) should all be removed from the Local Plan

Comments:

Additional Evidence Link:

Comment ID **HRU974**

Site ref (if applicable): **LP1625**

Person ID: **1228589**

Name: **Mrs Debbie Chew-Moulding**

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 NPPF states -“Once established Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified , through the preparation or updating of plans.”“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; Has this been fully exhausted? b) optimises the density of development, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport Has this been fully exhausted in already allocated housing sites within the borough, can this be increased? 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. Has this occurred? The reasons for additional housing is due to the economic strategy and increase in economic growth? Can additional sites be accommodated in neighbouring authorities as part of the Leeds City Region approach? Is there a need for additional housing due to unknown implications of the economic growth now the UK has left the EU? The inspector acknowledges that the - “relationship between employment growth and new housing is complex.-“Turely's report (2019) on - “Modelling the economic implications of the proposed housing requirement Calderdale Council”Contributes to how the labour force is assumed to behave, however, it does not appear to have

considered accommodating the housing in neighbouring authorities. It is felt that the Council has not fully exhausted all options in order to prevent development on Green Belt land. When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport . The site reports indicate that distance to the nearest rail station is more than 2km away. It is disputed that this site is well served by public transport and the site has not been previously developed, therefore considered to be contrary to NPPF. 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. The 5 key Purposes of Green Belts as the following: to check the unrestricted sprawl of large built-up areas; The development of this site would contribute to urban sprawl. It is considered that the accumulative affect of all the proposed development sites contribute to the sprawl of built up areas and at present the existing properties have a clearly defined boundary and the land contributes positively to the open space. to prevent neighbouring towns from merging into one another; to assist in safeguarding the countryside from encroachment; This site is Greenfield and development lead to a loss of Grade 3 Agricultural land, which is currently used and is of 'good to moderate' quality of land. 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 (The site is Greenfield) The NPPF states when defining Green Belt boundaries, plans should define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. The Council acknowledge the existing site has a strong boundary and once developed it will also have a strong boundary, however, the greenbelt land is being encroached and whilst it is accepted that a new boundary may also be strong, the main issue is the loss of Green Belt & Greenfield land, loss of agricultural land and continued urban sprawl. It is considered that allocating this land for development is contrary to the guidance provided in NPPF, therefore the plan and allocating of the land is not considered to be justified and sound.

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

Duty to Co-operate Reason:

Suggested Modifications:

The site is situated within the Greenbelt and is contradictory to NPPF. It is considered the site should be removed from the allocation of an additional housing site.

Comments:

Additional Evidence Link:

Comment ID **HRU984**

Site ref (if applicable): **LP1625**

Person ID: **1243601**      Name: **Mr Mark Connett**      Organisation:

Agent ID:      Name:      Organisation:

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

Legal Compliance Reason:

No The proposal for the LP1625 fails to acknowledge many planning guidelines and/or advice given on

environmental & social factors. Upon reading the national policy planning framework, I have found many points that contradict what the council is aiming to keep/put in place, the main one I believe is below. Proposals affecting the Green Belt Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are: a) buildings for agriculture and forestry; b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it; c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces; e) limited infilling in villages; f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: "" not have a greater impact on the openness of the Green Belt than the existing development; or "" not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority. To the best of my knowledge the council have failed to notify those closest to the site aware they were even added back in into the plan way back in 2017 I don't believe social media and word of mouth should be the way for the local people to find out. I feel it's a lack in communication at the very least.

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

Sound Reason:

No Flooding -Calder Valley is well known for flooding let alone the site in question which naturally takes a lot of the surface water that flows from the higher parts of Greetland. The proposal does not meet national policy. The NPPF states that "Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere". The recent floods we had on In February of 2020 only strengthen the point I am trying to make. We are constantly having interruption on our road network by the council having to continually maintain and repair the water system, the water going into these drains as a result of the flood plain being destroyed, this would put even more pressure on this, leading to more roadworks and even greater congestion. Clean Air Policy ; The sheer quantity of houses proposed on this site would mean far higher emissions and air pollution in west vale, on commutes to and from Halifax and beyond. Calderdale Council have declared a climate emergency yet are potentially willing to release greenbelt land with the intention to build a large amount of houses whilst destroying the natural benefits of the trees absorbing and storing the Carbon dioxide that we are creating. This site is also directly surrounding a preschool and the key stage 1 site of The Greetland Academy. Saddleworth Road is already a hugely congested road and that's before development of more houses that would use this road. From September 2020 I will have a child at each of these schools so I feel very passionate about how the children attending these schools will be directly affected from the decline in air quality around them for up to 7 hours a day. The proposition that this site allocation is where they spend most of their time seems highly unjustified when there are many other places in Calderdale more suited. The Green Belt - Loss of large area of Green Belt and Wildlife Corridor The NPPF states that When determining planning applications, local planning authorities should apply the

following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused on these grounds alone this site should be removed from the local plan. The Wildlife Corridor has a well-used public footpath that travels the whole length of the proposed Local Plan build site, as well as this the area is home to wild deer, foxes, squirrels, field mice, barn owls, kingfisher and much more. The brook itself is a healthy natural water-course with a thriving population of wild brown trout. Taking away something so natural and therapeutic that benefits local people by getting in touch with nature and to get children out into open spaces should be the last resort and with so many brownfield sites still available I believe this goes against many of the policies on the NPPF. A report recently submitted to the Adult Health & Social Care Scrutiny Board stating the need to retain Green Spaces for the Health and Wellbeing of Calderdale residents. This report was submitted by the Head of Planning. (This report is on Calderdale MBC's Website) Infrastructure - The road network in Greetland is already at breaking point on a good day, let alone when we have endless amounts of roadworks to contend with. the roads simply cannot take the proposed number of cars which all of these houses would bring with them. it takes me a good 20 minutes to do a 0.6 mile journey to the motor way on a morning. Both The Greetland Academy and West Vale Primary are full to capacity, as well as the feeder high school Brooksbank. Stainland Road Medical Centre would also struggle to attend to the additional patients this would bring with it, the local dentist has a 600 place waiting list for NHS patients. Allocation of land - I fail to understand why Greetland, Elland & Stainland have been grouped together, I believe this to be a deliberate attempt to mask the disproportionate quantity of building works being allocated to Greetland. while other wards have no sites added to the local plan. I believe this be disproportionate to the Greetland area, put that together with them all on one road and it's ridiculous. LP0026, LP0177, LP0952 and LP1625 are all on Saddleworth Road. Greetland is a community in its own right. Greetland is HX4 and a village whereas Elland is HX5 and a town I don't think we shouldn't be grouped together. The government requires land for he local plan to be designed in the whole of Calderdale there is no requirement to assign housing to an area that has such high flood risk, let alone land that routinely floods which will only become more frequent through climate change. density of houses could be increased in areas where land is not susceptible to flooding. Boris Johnson has called for councils to stop building on flood plains as well as the new SoS for Env. George Eustice has also pointed to this being a long term problem on them grounds alone this site along with LP0026, LP1625 & LP0952 should be removed from the local plan due to long term flooding.

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

Duty to Co-operate Reason:

I have not had any notification whatsoever of any potential plans to the local surrounding area.

Suggested Modifications:

This site should be removed from the local plan. Due to insufficient infrastructure and no exceptional circumstance to use Green belt land.

Comments:

Additional Evidence Link:

Comment ID **HRU995**

Site ref (if applicable): **LP1625**

Person ID: **1241730**

Name: **Mrs S Hirst**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

In my opinion the Council have failed to meet its three core principals of Community Involvement namely, Clarity, Inclusivity and Integrity. If it was not for the support of the local community many people would be unaware that the sites have been put back into the Local Plan and that a further consultation period has been made. Exactly what is expected of the general public is also unclear. Phrases such -“Is this Sound” have very little meaning to general public. The use of acronyms, legal and planning -“jargon” make the plan far from user friendly. I do not know how the -“average lay person” can be expected to form a clear and sound argument. With this in mind I would say that the plan is not at all -“inclusive” and as such would exclude a number of people from being able to express their opinions. The Local Plan Website is extremely challenging to navigate, even for the most computer literate. The Council are showing very little Integrity, with local Councillors and the community not being kept up to date with what is happening. The council has also failed to listen to the community in compiling the plan. Residents were asked to comment on the removal of this site (LP1625) from the Green Belt in 2015 and then on its inclusion in the Local Plan in 2017 . In both instances the overwhelming response from the community was that the land should not be in the Local Plan and should remain within the Green Belt. The sites in Greetland got the highest number of comments compared to the rest of Calderdale. Despite this, the Council, after initially removing the site, has now put it back into the Local Plan with no sound reasoning to support its actions. In addition, concern has been expressed by residents, as to why Greetland has been classified as part of Elland. Greetland is completely separate from Elland and it is misleading for the two areas to suddenly be -“consolidated” Residents of Greetland, on reviewing the Local Plan would have no reason to -“look under” Elland and would miss the opportunity to put forth their comments. Within the -“Settlement Hierarchy” the villages of Greetland/West Vale are not even listed, but the villages at either end of the Greetland (Holywell Green and Barkisland) are listed as Neighbourhood/Small rural areas. In connection with this, there are also questions as to true increase in the amount of housing stock for the Greetland area. In the Councils calculation for -“Distribution of House Growth” (Table 3 Infrastructure Delivery Plan 2019) it shows Greetland, along with Elland, Holywell Green & Stainland to have a growth of 8.21%. However, if Greetland and West Vale are viewed on their own ; which they should be ; using the latest Polling District Figures, the increase in housing stock is around 20%. This is too much for a village of this size and with such limited infrastructure. The Council also appear to have -“gone against” a number of policies set out in the National Policy Planning Framework such as: When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations . The council have not demonstrated that development of this Green Belt will outweigh the harm. The Council have simply created a vague list of possible ways to -“mitigate” problems, most of which have no concrete or sound basis and in some cases are just totally incorrect. When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. The land proposed for development is used as a natural storage area which controls the amount of water going down to Black Brook and ultimately helps prevent even more flooding down the valley.

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

Sound Reason:

LOSS OF GREEN BELT The site is currently designated as being in an area of Green Belt and in a recent survey it was seen to perform well in 3-5 areas. This area of Green Belt is also classified as being highly

sensitive. In 2018 the Council deemed that this area of land was of such significantly high importance that it should be removed from the local Plan and yet now feels that the land is suitable for development. The council have not demonstrated any sound reason for this reversal, other than more land is required. The council have also failed produce any evidence, to show that all available Brownfield sites have been exhausted. Indeed, when challenged, they seem unable to produce any current information with regards to Brownfield availability. Removal of this Green Belt land could, set the precedence for removing even more of the land from the Green Belt and for development to take place all along the valley. Any development of this Green Belt area would have a major impact on the landscape and dramatically change the character of the locality forever. The development of this area would also mean a considerable loss of Open Space. The Council have stated in their report that removal of this land would have -“no loss/no impact” on the area. There seems to be no consideration that taking the Saddleworth Road Development as a whole, would mean a loss of nearly 25 hectares of open Green space which would have a detrimental effect on the local community. The area is regularly used by walkers, cyclists, horse riders and families. The area is becoming even more popular due to a number of initiatives by the owners of the industrial plant. The site has a public right of way to the west of it. Whilst the developers have stated that this will be retained, it does not take into account what effect the development would have on the character and tranquillity of this area. Walking through a housing estate is not the same as walking through untouched green belt fields. FLOODING The fields within this site all provide land for the run off from the Moorland at the top of the valley. This is clearly demonstrated when we have heavy rain fall. Building on top of this natural soak away would leave nowhere for the rainfall to collect. Whilst the developers may well be able to drain the sites successfully there appears to be not account taken of where that water will then go and what potential that has for flooding elsewhere in the valley. Given the recent catastrophic flooding the area experienced on February 9 th this year ; this land should be removed from the Local Plan and allowed to provide much needed natural flood defences for the valley. ENVIRONMENTAL HEALTH The creation of so many houses is going to have a large impact on the amount of pollution created. The development, across all the sites on Saddleworth road, has the protentional to add over 1000 cars to the road. Currently pollution figures are not collected for Saddleworth Road due to -“its open nature” allowing pollution to disperse. However, this natural -“escape route” will be eroded if this considerable area of land is developed. Currently traffic can be cued nearly half a mile up Saddleworth Road waiting to get through the traffic lights in West Vale. The possibility of an increase in cars will mean more cars on the roads, with more engines idling and pumping out more pollution. This is particularly worrying due to the local infant school being next to the road. Monthly Pollution readings for West Vale obtained from 2019 Air Quality Annual Status Report show that these monthly readings regularly exceed the 40mg/ limit, which has been set by the Council. More traffic will only increase these numbers which will be against their own targets. INFRASTRUCTURE The MP for Calderdale, Craig Whittaker, has already expressed his concern regarding the “lack of a robust Infrastructure Plan” and how this will have a negative impact on the plan. The Infrastructure plan has no concrete solutions and does not address the many problems this development would bring such as lack of school places, both infant/junior and secondary, no NHS dentists and the pressure it will put on the local GP practice, to name but a few. The local school is unusual in that it split over two sites which are approximately half a mile apart. The intake is based on the proximity to the school site on Saddleworth Road. With the increase in housing on this road it could potentially mean that children living next to the School on Rochdale road could not secure a place. Potentially it could mean parents having to drive their children to schools away from the village thus adding to the congestion and pollution. The public transport is very limited, buses to Halifax run once every hour, do not operate in an evening and have limited service at a weekend. The buses frequently miss and consequently you are unable to rely on them as a means of commuting to work. The main concern though is how the increase in traffic will impact on the area and the lack of any foresight as to what impact this have. The Site Report states that - “Mitigation measures are likely to be required at the Stainland and Saddleworth road Junction” however it does not detail what the -“mitigation” will be. Whilst the Infrastructure plan gives details of local road -“improvements” which are due in this area, they are not of a scale which help alleviate the congestion at

this junction. It is also worthwhile noting that the M62 has just undergone extensive works to make it a - "smart motorway" which should help reduce congestion. However further schemes to convert areas to - "smart motorways" is now on hold pending Government review into its safety. Using the Sustainability Appraisal Report it can be seen that this site has 11 uncertain impacts, 1 negative and only 4 positives. When read in detail I would even question the validity of some of these - "positive" impacts and suggest they are more suited to uncertain or even negative. Given the amount of uncertain and negative points raised, I would question the validity of recommending this site as a suitable and sustainable area for development. Whilst we have been told that each site must have a separate and different submission, it has been nearly impossible to do this as each area of land is so interlinked. Indeed, to consider each site in isolation is not taking into account the full impact which developing over 24 hectares, with nearly 600 houses, will have on our local community and the environment.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

## **Main Issues and Council Response**

### **Legal Compliance**

Main Issues:

1. The Plan has not been prepared in line with the Statement of Community Involvement.
2. Question whether the Sustainability Appraisal has been prepared properly or used effectively.
3. Development will increase flood risk. The Plan does not comply with NPPF in this regard. No reference to flood mitigation.
4. Council should demonstrate that brownfield sites have been considered.
5. No legal justification for releasing land from Green Belt. Objectively assessed need does not amount to exceptional circumstances. Lack of exceptional circumstances. Creation of urban sprawl.
6. Loss of Green Belt, open space and countryside cannot be mitigated against.
7. The plan ignores all planning advice and requirements regarding environmental and social issues.
8. Ineffective public consultation, and complexity of the information available.
9. Ecology - impact on ecology, including Black Brook.
10. The housing requirement should be revisited in light of Brexit.

11. How is the archaeological interested going to be preserved?
12. Council has failed to demonstrate that development will not negatively effect existing communities.
13. The Plan does not meet para 177 of the NPPF nor the many planning guidelines and advice given on environmental and social factors.
14. Loss of public right of way.
15. There was no opportunity for Local Councillors to discuss the issues prior to Cabinet approving the increased housing numbers and potential allocations.
16. Utilise brownfield sites.
17. No plans in place for economic development.
18. Cumulative impact of development. Unfair distribution/disproportionate amount of development in Greetland.
19. No sound reasons why this site has been reintroduced at this stage.
20. Development of the site will have a negative impact on mental health.
21. Infrastructure - Lack of/pressure on existing amenities, services and facilities in the local area, e.g. schools, shops, doctors, public transport, utilities.
22. Disproportionate level of development in Greetland.
23. Local road network, specifically capacity and congestion in West Vale. No assessment has been undertaken of the local road network.
24. Increase in air pollution.
25. The presence of a housebuilder or developer on board should not be a reason to select a site for allocation.
26. The NPPF has been largely ignored.

Council's Response:

1. The Plan is considered to meet the requirements of the Statement of Community Involvement and the Regulatory Framework regarding consultation.
2. This issue has been responded to under 'Soundness'.
3. This issue has been responded to under 'Soundness'.
4. This issue has been responded to under 'Soundness'.
5. This issue has been responded to under 'Soundness'.



6. This issue has been responded to under 'Soundness'.
7. The plan has been drawn up following the NPPF and the regulatory framework.
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).
9. This issue has been responded to under 'Soundness'.
10. This issue has been responded to under 'Soundness'.
11. This issue has been responded to under 'Soundness'.
12. The Local Plan is supported by a large amount of evidence, and together with the site assessment process, it has been demonstrated that the level of housing growth can be accommodated. The Local Plan is supported by the Infrastructure Development Plan which sets out the infrastructure requirements resulting from the growth proposed in the borough. It is a compendium of projected infrastructure provision and it helps to ensure that this infrastructure is provided in a timely manner and in a coordinated and sustainable way.
13. It is not clear in what regard the Plan does not meet para 177 of the NPPF. The plan has been drawn up following the NPPF and the regulatory framework.
14. This issue has been responded to under 'Soundness'.
15. The update to the housing requirement has been subject to public consultation as per the relevant planning regulations whilst the volume of representations received demonstrates the community has taken the opportunity to submit its views. Calderdale Councillors discussed the proposed revisions to the Local Plan at the Cabinet Meeting of 14th October, at which local Councillors as well as the public were able to express their views.
16. This issue has been responded to under 'Soundness'.
17. The Council considers that the assessments undertaken are consistent with Regional, sub regional and local growth strategies, as evidenced at Examination Stage 1 Hearings. The Council's Inclusive Economic Strategy was adopted in 2018 and sets the framework for the delivery of aspirations for the period 2018-2024 in line with its Vision for 2024.  
The Council is satisfied that the Local Plan meets the employment needs of the borough, and includes a number of employment and mixed use allocations to contribute to meeting this need.
18. This issue has been responded to under 'Soundness'.
19. The Site Summary in the Site Assessment Report explains why this site is being proposed as an Additional New Housing Site.
20. This issue has been responded to under 'Soundness'.
21. This issue has been responded to under 'Soundness'.

22. This issue has been responded to under 'Soundness'.
23. This issue has been responded to under 'Soundness'.
24. This issue has been responded to under 'Soundness'.
25. The selection of sites has been undertaken in accordance with the Site Allocations Assessment Methodology Statement, Publication Draft 2018 (EV51.1). The presence of a housebuilder or developer was not an overriding reason for the allocation of a site. However, the Council is mindful of the requirement in NPPF to ensure the Local Plan identifies specific deliverable sites for years 1 -5, and specific, developable sites or broad areas for growth for the later years of the Local Plan, to meet housing need.
26. It is not clear which parts of the NPPF the Local Plan is not compliant with.

## Test of Soundness

### Main Issues:

1. Local road network, specifically capacity and congestion. The transport modelling fails to identify output from the Stainland Road-Saddleworth Road junction. Elland Station will not alleviate congestion at West Vale. Development along Saddleworth Road will have a detrimental impact on the West Vale junctions, further exacerbating an existing issue. Road safety issues linked to school drop off and pick up.
2. Ecology - Impact on wildlife including deer, fox, and bats, species within the Black Brook UK BAP Priority Habitat such as herons, dippers and trout. The Plan should pursue opportunities for securing measurable net gains for biodiversity.
3. Infrastructure - Lack of/pressure on existing amenities, services and facilities in the local area, e.g. schools, shops, doctors, utilities, public transport. Travel times to facilities will be longer than stated once this site is developed. Combined sewer overloads discharge into the Black Brook. No current plans to upgrade the sewer system. Lack of ability for schools to expand. Lack of committed investment.
4. Flooding - increased risk of flooding, building on greenfield sites will increase surface water flooding. Poor drainage including overloaded combined sewer overflows, leading to pollution in Black Brook. Site is a natural and essential soak away. Complex water system with natural springs. Does not comply with current policy and legislation on flooding. Clay soil in the area make SuDS unsuitable.
5. Lack of consideration of brownfield sites. The site at West Vale Works should be included in the Local Plan. Lack of Brownfield Land Register.
6. The Plan does not provide realistic mitigation for issues such as green belt loss, drainage/flooding, ecology and infrastructure.
7. Loss of Highly Sensitive Green Belt, including lack of exceptional circumstances. Lack of evidence that opportunities for brownfield redevelopment have been fully examined. Need to demonstrate consideration of alternatives. Densities on other sites should be increased to reduce the need for Green Belt release.
8. Cumulative impact of development in the area.

9. Creation of Urban Sprawl - impact on health and wellbeing, increase in pollution, increased car dependency.
10. Impact on air quality, particularly impacting on children. Monthly readings of air quality in West Vale regularly exceed the limit set by the Council. Noise pollution arising from increased traffic. Allocation contradicts the 2018 Clean Air Strategy. Development goes against Climate Change Emergency.
11. The Sustainability Appraisal scores would suggest there are two more suitable sites which should be replacements for LP0952 and LP0177. Question application of the Sustainability Appraisal in the site assessment process.
12. Sites should be allocated that in more suitable locations, nearer amenities.
13. Sites should be allocated to meet needs of the older population.
14. The additional local plan sites will be to meet the needs of "incomers".
15. There are no sites for employment in the Greetland and Stainland ward. This will increase commuting.
16. The Local Plan should be paused until the Brexit transition period has ended and the effects on growth can be better understood. Objectively assessed need is too high as it relates to out of date population projections, which have been superseded by lower ONS projections. Financial forecasting used to determine the number of houses is not sound and should be revised.
17. Has the Council asked other authorities to accommodate some of Calderdale's housing requirement?
18. Cumulative impact of development. Unfair distribution/disproportionate amount of development in Greetland.
19. Loss of agricultural land.
20. Site is outside the settlement envelope and would be an intrusion in the open landscape. Would be an isolated form of development.
21. How is the archaeological interest going to be preserved?
22. The Council has not satisfactorily addressed the alternative scenario of reducing employment numbers to protect the Green Belt in response to the Inspector and the declaration of a Climate Emergency.
23. Concern that this site has been unfairly assessed.
24. Loss of public/open space. Impact on public right of way. Impact on health and wellbeing.
25. Optimise the density of development including increasing densities on other allocations.
26. Potential for increased crime in the area.
27. Impact on heritage assets.

28. Where is the evidence that the "Northern Powerhouse" will generate such unprecedented growth in our region?
29. Loss of archaeological finds and historic buildings in the area.
30. The Plan fails to comply with the overarching principles of the NPPF.
31. Economic assumptions should be revised, resulting in lower levels of housing required. Employment estimations are over exaggerated, particularly in retail, health care and public services.
32. Environmental effects should be included in cost-benefit analysis and ecosystem service framework for a full and proper assessment of planning policy.
33. Increase density on housing sites in Brighouse.

Council's Response:

1. The Council considers that the evidence submitted supports and justifies the content of the Local Plan. The Council has commissioned transport modelling that is robust and fit for purpose. In addition, the Transport Assessment in any planning application would need to assess impact on local road network. 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.
2. The Conservation Section (Ecology) has indicated that development would be acceptable subject to various mitigation measures which have been included as site specific considerations. This includes provision of blue and green infrastructure and green roofs, and planting locally native species rich hedgerows. In addition, policies within the Green Infrastructure and Natural Environment chapter of the Local Plan, specifically Policy GN3, set out a clear and positive strategy to ensure the Council effectively manages its natural environment. Additionally, BT3 - Landscaping, ensures that new development integrates appropriately into its surroundings, contributes to the character of the area, and enhances local biodiversity.
3. The Infrastructure Delivery Plan is a compendium of projected infrastructure provision and it helps to ensure that this infrastructure is provided in a timely manner and in a coordinated and sustainable way. It sets out the infrastructure that will support the level of development that is proposed in the Calderdale Local Plan. The IDP is a living document, updated on at least a yearly basis and contains a chapter on healthcare, public transport, utilities and education provision. Combined sewer overloads discharge into the Black Brook. No current plans to upgrade the sewer system.
4. 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. The site is located 100% within Flood Zone 1 and 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 has noted that only one drainage issue has been identified on this land in the past and was subsequently resolved. With the necessary mitigation and assessment there are unlikely to be any significant flooding issues. With regard to clay soil being unsuitable for SuDS, it should be noted that many different SuDS techniques can be implemented. As a result, there is

no one standard correct drainage solution for a site.

5. The allocation process requires a willing land owner and developer in order to demonstrate the deliverability of the sites and therefore whilst there are aspirations to use as much brownfield urban land as possible this may not always be demonstrably deliverable. In terms of the site assessment process, in order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area, only using the most sensitive Green Belt when all alternative sites were used. The site referred to (West Vale Works) is an allocation in the Local Plan - LP1088. The Council's most up to date Brownfield Land Register was published on 31 December 2018. A revised register is currently being prepared.

6. The Council considers appropriate mitigation measures have been provided as detailed in the 'Reports Required' and 'Site Specific Considerations'.

7. The purpose of the Green Belt Review is to provide an understanding of the current strengths and weaknesses of the existing Green Belt and provide the basis for recommendations to change the Green Belt where appropriate. In order to assess Green Belt land against the NPPF purposes, a set of questions for each purpose has been developed including the need to prevent neighbouring towns from merging into one another and to preserve the setting and special character of historic towns.

In terms of the site assessment process, in order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area, only using the most sensitive Green Belt when all alternative sites were used.

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. 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. 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.

8. 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.

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. The policies within the Local Plan support the achievement of the Local Plan Transport Objective, 'To ensure the provision of a sustainable, safe and efficient transport system which reduces car dependency and improves quality of life through a balance of promoting economic growth, enhancing environments and improving transport access for communities'. To achieve these objectives the Council is developing a range of strategies and interventions, and the Local Plan has a role to play in supporting these, but also ensuring development proposals meet these objectives and contribute more widely to an integrated 'active mode' network.

10. 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. In addition, no concerns were raised regarding noise pollution.

11. The SA is part of the Local Plan preparation process and its purpose is to inform the development of the plan; it is not the sole contributor to proposing or rejecting site allocations. The methodology for assessing the impacts was part of the SA Framework that has been developed over a number of years. The SA Framework has been subject to a number of public consultations.

12. In order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area, only using the most sensitive Green Belt when all alternative sites were used.

13. The Council considers the Local Plan meets the housing needs of all groups of the population. Policy HS4 in particular addresses the needs of older and disabled population.

14. The Local Plan seeks to balance the housing growth with economic aspirations, to reduce in-commuting.

15. The growth of employment alongside new homes within Calderdale will provide opportunities for locally based employment reducing the need to travel. LP0059 is allocated for employment use (B1) and falls within the Greetland and Stainland ward.

16. The Planning Practice Guidance states that the 2014-based household projections should be used as the starting point for determining the level of housing provision. It also states that the 2016-based household projection should not be used. Where a recently produced Strategic Housing Market Assessment provides a figure greater than the standard method this is to be taken into account. Following the stage 1 hearings the Inspector expressed concerns around the housing figure in the Publication version of the Local Plan and requested the Council consider undertaking further work to assess the implications of housing need and requirement figures which align more closely with the Plan's economic strategy. Table 1 represents the outcome of this work. The implications of leaving the European Union are, as yet, unknown in relation to any impact on future housing requirements. The Government is clear that the current NPPF/PPG must be followed and also that Local Plans should be in place as soon as practicable.

17. See Submission Document SD 13 Duty to Cooperate Statement Including Statements of Common Ground (January 2019).

18. 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. The Local Plan is supported by a large amount of evidence, and together with the site assessment process, it has been demonstrated that the level of housing growth can be accommodated. The Local Plan is supported by the Infrastructure Development Plan which sets out the infrastructure requirements resulting from the growth proposed in the borough. It is a compendium of projected infrastructure provision and it helps to ensure that this infrastructure is provided in a timely manner and in a coordinated and sustainable way.

19. The site assessment process seeks to protect land which is of higher quality in terms of the Agricultural Land Classification. The site consists of predominantly Grade 3 Agricultural Land which is not considered "high quality".

20. The site is adjacent to the Urban Area, and it is not considered that it would be an intrusion in the

landscape nor result in isolated development.

21. West Yorkshire Archaeology Advisory Service has recommended a post-determination archaeological condition.

22. The Council is committed to supporting future employment growth in the district both to meet the job needs of residents and to grow the local economy. The housing requirement figure therefore needs to take into account policy-on factors relating to the Leeds City Region Local Enterprise Partnership (LEP) priorities and the district's contribution to meeting regional targets in the Strategic Economic Plan (SEP) as well as the effects of infrastructure investment (see CC21 – Modelling the economic implications of the proposed housing requirement Turley, 2019). Given this position the Council does not propose a modification in respect of this issue.

23. All sites assessments have been carried out in a consistent manner following the Site Allocations Assessment Methodology Statement, Publication Draft 2018 (EV51.1).

24. The site is currently designated as greenbelt but also performs the function of a natural/semi-natural open space. An assessment of open space in the area shows that there are sufficient alternative natural/semi-natural areas within the catchment of this site to meet the adopted standards. However as the site is designated for housing, open space would be required as part of any development since there are deficiencies in other typologies. The visual impact of any development should be considered. Where sites contain public footpaths, schemes will be expected to incorporate this in their layout, or if ultimately necessary, arrange for a suitable diversion.

Chapter 12 of the Local Plan (Health and Well Being) and guidance contained within the NPPF highlight the role of the planning system in supporting health, social and cultural wellbeing and creating healthy, inclusive communities. A health impact assessment (HIA) helps to ensure that health and wellbeing are being properly considered in planning policies and proposals.

25. 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. The revised housing requirement is to be partially met through an increase in densities on some of the mixed use sites.

26. Policy BT5 - Designing Out Crime of the Local Plan ensures that designing out crime and designing in community safety should be central to the planning and delivery of new development. The policy includes a range of criteria that the development proposal must have due regard to.

27. Policy HE1 of the Local Plan sets out a clear and positive strategy for the conservation, enjoyment and enhancement of Calderdale's historic environment and should be considered in conjunction with guidance provided in the National Planning Policy Framework, and planning policy guidance. It should be noted that this policy does not seek to unnecessarily or entirely prevent development which may affect a heritage asset. Instead, it aims to ensure that development proposals are sympathetic to heritage assets in that their significance and settings are understood, respected and either conserved or enhanced whilst safeguarding against their exploitation or endangerment. This will ensure a sustainable future for heritage assets, and for the historic environment as a whole.

The Conservation Section (Heritage), consider that development of this site is unlikely to result in harm to any designated heritage asset. The site is bounded by low stone boundary walls which are a characteristic feature of the local environment, and there is some evidence of historic field patterns, the form of which could be reflected in any development on the site. Therefore, it has been recommended that the stone

boundary walls are retained wherever possible.

28. . The Council considers that the methodology adopted in the Employment Land Study (EV1) and the Employment Technical Paper (EV02) meets the requirements of National Planning Policy Guidance. The approach uses the Regional Econometric Model which is a complex economic database and impact model for Yorkshire and Humber, and data in the model consists of historical employment, output, productivity, population estimates and forecasts, and other labour market and environmental information. The Model provides a consistent database which underpins the economic policies of the LEP and other Districts in the Leeds City Region.

29. A Predetermination Archaeological Evaluation is listed in Report Required. Policy HE3 also requires proposals affecting a Class III archaeological site should conserve those elements which contribute to its significance.

30. The Council has prepared the Plan in accordance with NPPF

31. The Council is committed to supporting future employment growth in the District both to meet the job needs of residents and to grow the local economy, and as a member of the Leeds City Region to support the aspirations of the Local Enterprise Partnership. The level of job growth is based on forecasts which take into account these policies, infrastructure improvements programmed under the West Yorkshire Plus Transport fund, and the M62 Enterprise Zone, and is referred to as the 'Policy on with Transport' assessment. The Council believes this is a sound basis for assessment and it provides the basis for the housing requirement assessment presented in CC21 – Modelling the economic implications of the proposed housing requirement (Turley, 2019).

Given this position the Council does not propose a modification in respect of this issue.

32. The Council has completed a Sustainability Appraisal of the Local Plan, the purpose of which 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.

33. 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' published in 2000. These have been used in assessing the housing allocations in order to determine indicative site capacity. The revised housing requirement is to be partially met through an increase in densities on some of the mixed use sites.

## **Duty to Co-operate**

### **Main Issues:**

1. Development of Green Belt land would effect character of the area, be detrimental to ecology and residents, and be illegal with regards to flooding and Green Belt policy. Creation of urban sprawl.
2. Ineffective public consultation. Insufficient time to prepare representations.
3. Concerns about the way in which the Local Plan has been formulated and worries about the influence and involvement of major developers in selecting sites.
4. Constraints and negative effects cannot be mitigated against. Not viable to build houses here.



5. No evidence that the duty to cooperate has been complied with.
6. Economic forecast is out of date.
7. Increased risk of flooding, including surface water run off. Impact on increasing flood risk elsewhere.
8. Utilise brownfield sites first.
9. Local road network, specifically congestion, capacity and road safety.
10. Increase in air pollution.
11. Infrastructure - Lack of/pressure on existing amenities, services and facilities in the local area, e.g. schools, shops, doctors, utilities, public transport.
12. Ecology - impact on ecology and wildlife, including bats, deer, foxes.
13. Lack of transparency regarding the reintroduction of sites.
14. Housing need should be transferred to neighbouring authorities.

Council's Response:

1. This issue has been responded to under 'Soundness'.
2. 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).
3. The selection of sites has been undertaken in accordance with the Site Allocations Assessment Methodology Statement, Publication Draft 2018 (EV51.1). The presence of a housebuilder or developer was not an overriding reason for the allocation of a site. However, the Council is mindful of the requirement in NPPF to ensure the Local Plan identifies specific deliverable sites for years 1 -5, and specific, developable sites or broad areas for growth for the later years of the Local Plan, to meet housing need.
4. The Council considers appropriate mitigation measures have been provided as detailed in the 'Reports Required' and 'Site Specific Considerations'.
5. See Submission Document SD 13 Duty to Cooperate Statement Including Statements of Common Ground (January 2019). Calderdale is part of the Leeds City Region (LCR) and a member of the West Yorkshire Combined Authority (WYCA). The LCR has a well-established programme for joint working and cooperation at both member and officer levels – planning portfolio holders and heads of planning meeting regularly, and there is specific 'duty to cooperate' group attended by planning policy officers.
6. This issue has been responded to under 'Soundness'.
7. This issue has been responded to under 'Soundness'.
8. This issue has been responded to under 'Soundness'.
9. This issue has been responded to under 'Soundness'.

10. This issue has been responded to under 'Soundness'.
11. This issue has been responded to under 'Soundness
12. This issue has been responded to under 'Soundness
13. The Site Summary in the Site Assessment Report explains why this site is being proposed as an Additional New Housing Site. Document CC37 sets out the process for identifying and assessing the additional site allocations.
14. See Submission Document SD 13 Duty to Cooperate Statement Including Statements of Common Ground (January 2019).

### **Suggested Modifications**

1. Remove the site from the Local Plan.
2. Consider more suitable brownfield sites in Calderdale and neighbouring authorities.
3. Remove sites within 'most sensitive Green Belt' parcels.
4. A clear assessment of the impact of additional traffic on current infrastructure and the environment relating to air pollution and the cost of development required to keep traffic congestion at current levels.
5. A robust assessment of the danger of building on a flood plain categorised as high risk by the environment agency and the cost of development to safeguard against flooding.
6. Refuse to accept the housing requirement.
7. Prepare a Brownfield Register.
8. Draft a new economic model.
9. Increase housing densities.
10. Neighbouring authorities should accommodate some of Calderdale's need.

### **Council's Response:**

1. No change required - The allocation of the site is considered to be consistent with the Council's site allocation methodology and positioning in the trajectory as set out in the Housing Technical Paper. 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.
2. No change required. In order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area. The NPPF/PPG requires sites to be deliverable or developable depending on where they are positioned in the housing trajectory. All sites have been viability tested with any brownfield sites meeting the required tests already included in the Local Plan. The evidence therefore precludes the allocation of further brownfield (previously developed)

sites.

3. No change required - In order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area, only using the most sensitive Green Belt when all alternative sites were used.
4. The Council considers that the evidence submitted supports and justifies the content of the Local Plan.
5. The Council considers that the evidence submitted supports and justifies the content of the Local Plan.
6. No change required - In order for its Local Plan to be found sound the Council must make provision for the housing requirement identified in the SHMA to be either met within the district or in neighbouring districts. As the surrounding authorities have agreed through the Leeds City Region Statement of Common Ground to meet their own housing requirement this latter option is precluded.
7. A revised Brownfield Land Register is currently being prepared.
8. The Council is committed to supporting future employment growth in the District both to meet the job needs of residents and to grow the local economy, and as a member of the Leeds City Region to support the aspirations of the Local Enterprise Partnership. The level of job growth is based on forecasts which take into account these policies, infrastructure improvements programmed under the West Yorkshire Plus Transport fund, and the M62 Enterprise Zone, and is referred to as the 'Policy on with Transport' assessment. The Council believes this is a sound basis for assessment and it provides the basis for the housing requirement assessment presented in CC21 – Modelling the economic implications of the proposed housing requirement (Turley, 2019). Given this position the Council does not propose a modification in respect of this issue.
9. No change required - 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' published in 2000. These have been used in assessing the housing allocations in order to determine indicative site capacity. The revised housing requirement is to be partially met through an increase in densities on some of the mixed use sites.
10. No change required - 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. See Submission Document SD 13 Duty to Cooperate Statement Including Statements of Common Ground (January 2019).

## Document Section: 11 Halifax Additional Housing Sites

### **Representations**

Comment ID

Site ref (if applicable):

Person ID:

Name:

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:

Comments:

Additional Evidence Link:

### **Main Issues and Council Response**

#### **Legal Compliance**

Main Issues:

Council's Response:

#### **Test of Soundness**

Main Issues:

Council's Response:

#### **Duty to Co-operate**

Main Issues:

Council's Response:

**Suggested Modifications**

Council's Response:

## Representations

Comment ID **HRU1058**

Site ref (if applicable): **LP0983**

Person ID: **1129788**

Name: **Mr Graham Jepson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Wildlife is thriving and having lived on Maltings Road for nearly 13 years we have seen deers, badgers, foxes, rabbits, birds and so much more on this area of land. This is an area of green belt that is home to so much. It is an important area of greenfield with many people choosing to use the woods here as a place of recreation and walking. Unfortunately there has been already a number of traffic accidents on Maltings Road and the surrounding road network. So far it has only been wildlife and pets that have been killed or injured. The additional of extra housing will only add to the already busy road. The road network around Maltings road and Fountainhead Village is not adequate enough currently, let alone with more houses to be added. There has already been several occasions whereby emergency services, buses and recycling trucks have been slowed or prevented from getting down the road. Flooding is already an issue in the area, more construction work will lead to more run off in the area and more flooding. The area in question already retains a lot of water preventing flooding further down our valley. The building of houses on Maltings road will directly impact on my natural light and views across the green fields and woods. There will also no doubt be increased noise pollution.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU11**

Site ref (if applicable): **LP0983**

Person ID: **1130293**

Name: **Mr Ben Greenwood**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The system to offer feedback on the plan is ridiculously complicated & the time allowed to enter feedback is too short. This should be easy for people to raise concerns, it is not.

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

Sound Reason:

Local roads are not suitable for existing traffic, including bus routes. Extra housing will put the minor roads under even more stress, more parked cars will lead to more congestion & a dangerous situation where emergency vehicles cannot access the housing. Wildlife is thriving around the fountain head area, however deer are already killed quite regularly due to the volume of traffic. Flooding is already an issue in the area, more construction work will lead to more run off in the area and more flooding.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1133**

Site ref (if applicable):

Person ID: **1243892**

Name: **Mrs Lucy Peebles**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Trying to access any document and understand how to make a comment is ridiculously difficult and I believe has been done so to stop people objecting. This is not a clear and transparent process.

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

Sound Reason:

The traffic around the village is already putting too much demand on local infrastructure. The surrounding roads are narrow, steep and totally unsuitable for the number of cars already using them. The access roads are not yet adopted by the local authority so how would the surrounding areas cope with the increase in lorries and residents cars. There are already regular small accidents on the surrounding roads without adding in HGVs and more cars. to use this site would mean destroying hundreds of trees at a time when we should be protecting trees to help with local flooding issues. The village regularly suffers from flooding of the access road already. The green parts of the village are home to a variety of wildlife including deer, bats and badgers, this would be putting them at further risk. There is a difficulty in accessing good school places, how will this extra demand be addressed

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

Duty to Co-operate Reason:

Suggested Modifications:

The site needs to be easy to access, navigate and comment on. It's not user friendly in anyway and makes the process difficult. The legal way questions are worded is trying to put people off commenting.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609731>

Comment ID **HRU1238**

Site ref (if applicable): **LPO931**

Person ID: **1243935**

Name: **Mrs Wendy Snell**

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:

Sir/Madam, I note that, again, the council is considering land at the back of Carr Green Drive to build houses on. I am particularly concerned after the recent (and ongoing) flooding in Mytholmroyd, Sowerby Bridge, Hebden Bridge and the bottom of Luddenden Lane. Our gardens are water-logged and one of our neighbours has a small waterfall coming off his garden into the road. The field behind us is important for soaking up much of this excess water and even in its present state, water is flooding down into the gardens. If houses are built on there, there is less land to absorb water, which will then cascade and flood our homes. We are being repeatedly told that global warming and extreme weather is going to escalate, thereby increasing the risk of flooding. Yes, people need to live somewhere and there are empty houses and even the old clog mill that would be suitable for renovation and providing flats. On top of this, which is my main concern, there is threat to wildlife. There are not many green spaces left around the village, this is one of the few and there are rabbits, foxes and deer that use the field. It is also popular with dog walkers and horse back riders. Where would they all go? This land was considered for building on only last year and was turned down. Please don't build on the field, the cost could be very high indeed, including law suits for compensation when our houses flood.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:



Comment ID **HRU1594**

Site ref (if applicable): **LP0983**

Person ID: **1244141**

Name: **Mrs Caroline Rankin**

Organisation:

Agent ID:

Name:

Organisation:

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 feel the council planning team have given due care and consideration to the factors around this site and the issues it will bring to existing householders within the area. Traffic - both Wood Lane and Doctor Hill are heavily used by traffic at the moment not only by residents of the area but by people using it as a cut through and rat run, it is only a matter of time before a serious accident occurs. Wood Lane is basically a single track road, made worse by the recent resurfacing work that has narrowed the road further by the high ridge between the cobbles and tarmac, if a car wheel was to get stuck in this ridiculous trough then the car driver would not be able to avoid being taken into the stone wall. Due to people avoiding this trough they drive up and down the centre of the road straight at cars coming in the opposite direction. The entrance/exit between Wood Lane and Long Lane is nothing but dangerous due to no-one being able to see in either direction if anything is coming in the opposite direction. A further 109 houses would in fact probably incur a further 300+ vehicles on this already congested route. Flooding - the top of Wood Lane/Doctor Hill junction regularly floods with the water running from the fields above, this has resulted in the gate having to be left open to alleviate the flood water on the road. The bridge at the bottom of Wood Lane regularly floods, this has recently been helped by the provision of 2 tubes put through the stone wall which takes the surface water off the road and into Hebble Brook. Hebble Brook is already at breaking point, with each high rainfall the Brook gets higher and higher the recent floods in February were the highest I have seen the Brook in the last 10 years and the Brook damaged several properties on our Road and very nearly came close to bursting it's banks in our garden, the bridge just past our houses was completely submerged. Further housing in this area will remove the natural flood areas that exist and result in the issue being pushed further down the hill meaning that the houses in Larch Close and Hebble Vale Drive will flood more regularly as they will bear the brunt of the water that has been displaced by the building of the houses. Wildlife - The area has an abundance of wildlife and flora that would be destroyed by the building on this land. We personally have seen Badgers, Deer and Bats to name but a few. There have already been several incidents of Deers being run over near Shroggs, reducing their habitat further will only incur more accidents on already busy roads putting both the animals and peoples lives at risk. I feel that the council are being very shortsighted if they wish to use this land for building when there are already lots of areas within Halifax that have empty and abandoned buildings on them that could more easily be developed into housing. I assume the council are not prepared to consider these options due to the demolition costs that would be associated with these and instead would rather create a flood risk for residents than upset developers. Money would be better spent assisting the residents with flood barriers rather than making the situation worse.

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

Duty to Co-operate Reason:

Suggested Modifications:

Site number LP0983 needs to be removed from the plan

Comments:

Additional Evidence Link:

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Comment ID **HRU1696**

Site ref (if applicable): **LP0983**

Person ID: **1244208**

Name:

Organisation: **Begbies Traynor (SY) LLP**

Agent ID: **1244206**

Name: **Tom Robinson**

Organisation: **Jones Lang Lasalle**

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

Legal Compliance Reason:

See supporting letter.

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

Sound Reason:

See supporting letter.

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

Duty to Co-operate Reason:

See supporting letter.

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5610395>

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Comment ID **HRU2**

Site ref (if applicable): **LP0983**

Person ID: **1121396**

Name: **Mr John Taylor**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Major access issues to site - traffic likely to increase - 45 additional vehicles (1.5 per property), infrastructure cannot cope with additional traffic. This needs proper assessment by some actually visiting the site and watching how Maltings Road is used particularly at peak times. Destruction of ever decreasing green areas

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU2017**

Site ref (if applicable):

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?:

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION The majority of the site is covered by TPO trees and is undevelopable. In addition, the approach roads are unsuitable to support additional residential development.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5632539>

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Comment ID **HRU2260**

Site ref (if applicable):

Person ID: **1246937**

Name: **Emma Sharpe**

Organisation: **Inspector of Historic Buildings and Areas**

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 FOR FULL REPRESENTATION The site specific considerations for several of the proposed allocations refer to -“consideration of recommendations in the Heritage Impact Assessment” In order for the development of these allocations to be compatible with not only national policy guidance but also the Plan's policies for the conservation of the historic environment, these mitigation measures need to be implemented as part of any development proposals. Consequently, mitigation measures need to be firmly and effectively tied into any eventual site specific policies. Unfortunately, as worded, the policy suggests that development need only 'consider' the recommendations, with no requirement for the design of a scheme to put into effect the proposed mitigation measures. We therefore consider it has not been shown that these sites could be developed in a manner which would not harm the setting of heritage assets in the vicinity. This is an issue we raised at Publication Draft stage (our letter of 18 September 2018). We are currently working on a Statement of Common Ground with your authority, aiming to agree wording to effectively tie the recommendations of the Heritage Impact Assessments to the relevant Local Plan policies. If it is proposed to proceed with the additional site allocations we recommend this would also apply to those sites.

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

Duty to Co-operate Reason:

Suggested Modifications:

Amend Site Specific Consideration to ensure no harm to setting of heritage assets in the vicinity.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5635295>

Comment ID **HRU425**

Site ref (if applicable):

Person ID: **1139601**

Name: **Ms Nicola Hargreaves**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Flood risk The area can not cope with additional traffic, the road network is not sufficient damage to

wildlife and environment noise pollution

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

Duty to Co-operate Reason:

Registering any comments on the consultation process seems to be a difficult procedure

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU429**

Site ref (if applicable): **LP1409**

Person ID: **955905**

Name: **Mr Graham Fellows**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Wood lane is too steep and already very hazardous to current traffic levels. The top junction into Ovenden wood lane is one of the steepest in Halifax and is impossible in snow and ice. The bottom junction into Long lane can just about be negotiated by two cars entering and leaving the junction. This causes queing both in Wood lane and delays/disruption in Long Lane the main road. Any extra cars from the proposed plan will be dangerous and disastrous. Also this plan will totally destroy the remaining green belt and wildlife corridor. The benefits of these small green fields /views are difficult to quantify but add to local residents well being and recreation.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU9**

Site ref (if applicable): **LP0983**

Person ID: **1121208**

Name: **Mr Nicholas Hardcastle**

Organisation:

Agent ID:

Name:

Organisation:

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 Barrats/David Wilson Homes development around Ovenden Wood Road has already pushed the roads around here to their limits. The roads are not designed for this many cars and if these developments go ahead, it will only get worse. Gibb Lane at one end is very steep, still cobbled, has blind bends and has parts only one car will fit through. At the other end, Doctor Hill is extremely busy and Wood Lane is also on a steep incline with a very dangerous junction at the top (this new development will make this worse) and is extremely poorly maintained as a whole. Moreover, Maltings Road itself is very busy due to the nursery, college and new development around Signal View. The roads will either fall apart or there will be a bad accident if all these new homes are built around here.

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

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed.

Comments:

Additional Evidence Link:

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## **Main Issues and Council Response**

### **Legal Compliance**

Main Issues:

1. Format of consultation was not effective.

Council's Response:

1. Extensive and inclusive consultation has been carried out throughout all stages of the Local Plan preparation process in accordance with the Council's adopted Statement of Community Involvement and is detailed in the Consultation Statement (Regulation 22).

### **Test of Soundness**

Main Issues:

1. Site access.
2. Local Road Network - specifically capacity and road safety.

3. Open Space - loss of open space, loss of recreation facility.
4. Impact on wildlife, including deer, badgers, foxes.
5. Increased risk of flooding, including on land downstream.
6. Noise pollution
7. Infrastructure - Lack of/pressure on existing amenities, services and facilities in the local area, e.g. schools, shops, doctors, utilities, public transport.
8. Utilise brownfield sites first.
9. The site is covered by TPOs.
10. It has not been shown that these sites could be developed in a manner which would not harm the setting of heritage assets in the vicinity. Mitigation measures need to be firmly and effectively tied into any eventual site specific policies.

Council's Response:

1. Site access can be achieved from Maltings Road and site is adjacent to a recently developed residential site. Maltings Road is of adequate width and junction with Ovenden Wood Rd is suitable for development, subject to acceptable operational assessments.
2. Infrastructure considerations to include the impact of development on the local road network have been taken into consideration as part of the site assessment process. The Transport Assessment with any submission would need to address the impact of additional traffic and identify mitigating improvements.
3. The site is currently designated as greenbelt but also performs the function of a natural/semi-natural open space. An assessment of open space in the area shows that there are sufficient alternative natural/semi-natural areas within the 1200m catchments of this site to meet the adopted standards and that there are other greenbelt sites performing this function within the 400m and 600m catchment. Although the site may be used informally for recreation this cannot be safeguarded since it is private land and it is not designated as open space. The visual impact of any development should be considered.
4. The site assessment considered ecological issues, and concluded that there is unlikely to be an adverse impact if mitigation measures are implemented, which are detailed in the site assessment reports.
5. The site assessment process considered the flood risk for this site. It concluded that subject to a Flood Risk Assessment being undertaken at planning application stage, the site is suitable for development.
6. A Noise Impact Assessment has been listed as a report that is required to accompany any planning application.
7. The Infrastructure Delivery Plan is a compendium of projected infrastructure provision and it helps to ensure that infrastructure is provided in a timely manner and in a coordinated and sustainable way. It sets out the infrastructure that will support the level of development that is proposed in the Calderdale Local Plan. The IDP is a living document, updated on at least a yearly basis and contains a chapter on healthcare, public transport, utilities and education provision.

8. The allocation process requires a willing land owner and developer in order to demonstrate the deliverability of the sites and therefore whilst there are aspirations to use as much brownfield urban land as possible this may not always be demonstrably deliverable. In terms of the site assessment process, in order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area, only using the most sensitive Green Belt when all alternative sites were used.

9. The developable area excludes the area of deciduous woodland. Policy GN5 includes criteria for the assessment of proposals which seek to remove trees which are subject to 'Protection'.

10. The Council has prepared a Statement of Common Ground with Historic England, and has agreed amended wording for the Site Specific Considerations for sites included in the Publication Draft Local Plan. This wording will be amended for all additional sites in this consultation.

## **Duty to Co-operate**

Main Issues:

1. Ineffective public consultation

Council's Response:

1. Extensive and inclusive consultation has been carried out throughout all stages of the Local Plan preparation process in accordance with the Council's adopted Statement of Community Involvement and is detailed in the Consultation Statement (Regulation 22).

## **Suggested Modifications**

1. Remove the site from the Local Plan.

2. Ensure consultation portal is easy to navigate.

3. Amend Site Specific Consideration to ensure no harm to setting of heritage assets in the vicinity.

Council's Response:

1. No change required - The allocation of the site is considered to be consistent with the Council's site allocation methodology and positioning in the trajectory as set out in the Housing Technical Paper. 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.

2. 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).

3. Agreed. The Council has prepared a Statement of Common Ground with Historic England, and has agreed amended wording for the Site Specific Considerations for sites included in the Publication Draft Local Plan. This wording will be amended for all additional sites in this consultation.



## Document Section: Site number LP1128 Land off Park Lane, Siddal, Halifax

### Representations

Comment ID **HRU2018**

Site ref (if applicable):

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?:

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION Narrow site with steep topography. Access road width is unsuitable to achieve development.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5632539>

### Main Issues and Council Response

#### **Legal Compliance**

Main Issues:

Council's Response:

#### **Test of Soundness**

Main Issues:

1. This site is not developable - Narrow site with steep topography. Access road width is unsuitable to achieve development.

Council's Response:

1. 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 Council considers that the application of the methodology has allowed the consideration of suitable, deliverable, viable sites.

**Duty to Co-operate**

Main Issues:

Council's Response:

**Suggested Modifications**

Council's Response:

## Representations

Comment ID **HRU10**

Site ref (if applicable): **LP1409**

Person ID: **1121208**

Name: **Mr Nicholas Hardcastle**

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:

The Barrats/David Wilson Homes development around Ovenden Wood Road has already pushed the roads around here to their limits. The roads are not designed for this many cars and if these developments go ahead, it will only get worse. The junction at the top of Wood Lane where it meets Ovenden Wood Road has extremely poor visibility and cannot cope with the number of cars. The junction where it meets Long Lane in Wheatley is also also very difficult to negotiate. Moreover, the bridge near Hebble Vale Drive is a pinch-point that's very hard to navigate when cars are coming in both directions. Wood Lane simply cannot cope with more cars.

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

Duty to Co-operate Reason:

Suggested Modifications:

Site needs to be removed.

Comments:

Additional Evidence Link:

Comment ID **HRU1271**

Site ref (if applicable): **LP1409**

Person ID: **1242421**

Name: **Mrs Karen Nelson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Further to my comments above I would like to add an additional video which was taken on 9/2/20. It is of the bridge which is just below the land you propose to build on. The water is running though the fields and down onto the houses below (Larch Close and Hebble Vale), if houses were built on this land it would vastly increase the risk of flooding. I have taken some footage of the bridge which is on the end of larch close (also known as Willow Brook) by Wood Lane - near to hebble vale drive . This footage shows just how close we were to being flooded and cut off only a couple of weekends ago. Please review this carefully and consider. If you would like further photos, I would gladly provide them.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609747>

Comment ID **HRU1288**

Site ref (if applicable): **LP1409**

Person ID: **1243950**

Name: **Mr Dan Lightowler**

Organisation:

Agent ID:

Name:

Organisation:

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'm massively concerned at the possibility of a further 100+ homes been built within what is already a heavily populated location, within a heavily under resourced area from Schools to Dentists, to local ammenities such as a grocery stores etc...I think I'm even more concerned that the location is having so much time been considered, as anyone who lives within half a mile of the area will shake their heads as to how it is in anybodies thoughts. Risk to wildlife In my time as a resident, and the majority as a shift worker, I've seen a number of badgers on both Wood Lane, as well as the main run Larch Close just off of it. I've seen a paddle of ducks making their way up the river most summers. Bats are a common sight whilst in my yard in the summer. Wild Deer are constant sight through Spring and Summer, of which my young daughter takes particular delight looking out for. Flooding Risk The recent flooding and damage to property both on Hebble Lane and Larch Close is well recorded now. I'm sure a project of this size would put further strain on the flood risk and any infrastructure in place. Traffic Wood Lane is already in need of major work to make it compatible with the strain already put on it from recent housing projects. It's used as a cut through from both sides of the brook, and it's already a tricky task both getting onto Wood Lane, or out of it. I know that when we had our daughter, it was at times a dangerous job just getting to the top of either side due to the amount of traffic and the fact there are no paths. Add to this the yearly shut down of Brakenbed Hill, pushing even more traffic to Wood Lane, to add a further 100+ houses directly onto that problem doesn't seem comprehensible to anyone who lives in the area.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1597**

Site ref (if applicable): **LP1409**

Person ID: **1244141**

Name: **Mrs Caroline Rankin**

Organisation:

Agent ID:

Name:

Organisation:

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 feel the council planning team have given due care and consideration to the factors around this site and the issues it will bring to existing householders within the area. Traffic - both Wood Lane and Doctor Hill are heavily used by traffic at the moment not only by residents of the area but by people using it as a cut through and rat run, it is only a matter of time before a serious accident occurs. Wood Lane is basically a single track road, made worse by the recent resurfacing work that has narrowed the road further by the high ridge between the cobbles and tarmac, if a car wheel was to get stuck in this ridiculous trough then the car driver would not be able to avoid being taken into the stone wall. Due to people avoiding this trough they drive up and down the centre of the road straight at cars coming in the opposite direction. The entrance/exit between Wood Lane and Long Lane is nothing but dangerous due to no-one being able to see in either direction if anything is coming in the opposite direction. A further 109 houses would in fact probably incur a further 300+ vehicles on this already congested route. Flooding - the top of Wood Lane/Doctor Hill junction regularly floods with the water running from the fields above, this has resulted in the gate having to be left open to alleviate the flood water on the road. The bridge at the bottom of Wood Lane regularly floods, this has recently been helped by the provision of 2 tubes put through the stone wall which takes the surface water off the road and into Hebble Brook. Hebble Brook is already at breaking point, with each high rainfall the Brook gets higher and higher the recent floods in February were the highest I have seen the Brook in the last 10 years and the Brook damaged several properties on our Road and very nearly came close to bursting it's banks in our garden, the bridge just past our houses was completely submerged. Further housing in this area will remove the natural flood areas that exist and result in the issue being pushed further down the hill meaning that the houses in Larch Close and Hebble Vale Drive will flood more regularly as they will bear the brunt of the water that has been displaced by the building of the houses. Wildlife - The area has an abundance of wildlife and flora that would be destroyed by the building on this land. We personally have seen Badgers, Deer and Bats to name but a few. There have already been several incidents of Deers being run over near Shroggs, reducing their habitat further will only incur more accidents on already busy roads putting both the animals and peoples lives at risk. I feel that the council are being very shortsighted if they wish to use this land for building when

there are already lots of areas within Halifax that have empty and abandoned buildings on them that could more easily be developed into housing. I assume the council are not prepared to consider these options due to the demolition costs that would be associated with these and instead would rather create a flood risk for residents than upset developers. Money would be better spent assisting the residents with flood barriers rather than making the situation worse.

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

Duty to Co-operate Reason:

Suggested Modifications:

LP1409 needs removing from the plan

Comments:

Additional Evidence Link:

Comment ID **HRU1701**

Site ref (if applicable): **LP1409**

Person ID: **1244200**

Name: **Mr Nicholas Green**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The plan is for Green Belt land

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

Sound Reason:

Regarding the proposal to build 109 houses on the site on Wood Lane, there are a number of points I would like to raise. I have lived on Hebble Vale Drive for 26 years and I feel we will be heavily impacted by this proposal. In December 2015 we had a prolonged period of heavy rain which filled Hebble Brook to the brim. This caused the collapse of the retaining wall between the gardens and brook for properties on Larch Close and caused damage to the retaining walls along Hebble Vale Drive. On the weekend of 9th and 10th of February this year Hebble Brook burst its banks and flooded many rear gardens along Hebble Vale Drive causing a lot of damage. The amount of water that Hebble Brook now carries has increased since the building of houses on Larch Close and Fountainhead village. I feel that building these 109 houses will also increase the amount of water that Hebble Brook has to carry. The brook is home to fish, heron, ducks and crayfish and there are deer, badgers and foxes that roam on the greenfield site. Recently we've been informed that there are badger setts in the field in this proposal too. There are also squirrels, bats and owls in the surrounding trees. Badgers and bats I believe are protected species. Another major concern is the road infrastructure. Wood Lane cannot cope with any more traffic and a number of accidents have already taken place. The bridge over Hebble Brook is single track and is a bottleneck for traffic. It was also not designed for the amount of traffic that is currently using it. The exit from Wood Lane onto Long Lane is a very dangerous junction as it not wide enough for 2 cars. It already needs to be widened to make it safe. Also Wood Lane does not have ANY footpath along it's whole length. As a narrow road it is extremely dangerous already for pedestrians. I hope you take these points into consideration.

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

Duty to Co-operate Reason:

Suggested Modifications:

Use brown field sites

Comments:

Additional Evidence Link:

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Comment ID **HRU1714**

Site ref (if applicable): **LP1409**

Person ID: **1244196**

Name: **Mrs Tracy Green**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

This plan has not been well thought out given the amount of houses already been built which have now led to flooding in the local area affecting residents on Hebble Vale Drive and Larch close. There has been no consultation with local residents about this plan. Wood Lane is dangerous for pedestrians at the best of times and traffic is becoming unbearable especially when Brackenbed Road is shut. There is wildlife present in and around the proposed site and it is believed that there are Badgers near the proposed site.

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

Duty to Co-operate Reason:

Suggested Modifications:

Further consideration of the surrounding area needs to be made. Risk assessment of further / increased flooding to the area due to building.

Comments:

Additional Evidence Link:

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Comment ID **HRU1873**

Site ref (if applicable): **LP1409**

Person ID: **1246318**

Name: **Karen Doyle**

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 not a suitable site. For the amount of houses to be built. Wood Lane is a country Lane which is busy at the best of times. There will be more traffic from these new homes which Wood Lane will not cope with. Access from Long Lane is narrow and a blind junction. After the weather over the last 2 weeks it has been shown that these fields are needed for water to soak and run off. Any houses built will find the water running through them down into Hebble Brook. The local services like schools and doctors are already under pressure. One example the doctors surgery in Nursery Lane is already closing. Hope you take my concerns when deciding this planning application

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1897**

Site ref (if applicable): **LP1409**

Person ID: **1246434**

Name: **Emma Parker**

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:

This proposal by law cannot proceed, I can assure all concerned as an owner of a dachshund dog (who were bred to hunt badgers) and a resident of hebble vale drive for over 12 years we have a community of these protected badgers, having revised the legislation these wildlife remain protected unless you tell me otherwise, planning permission cannot proceed?

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

Duty to Co-operate Reason:

Suggested Modifications:



Comments:

Additional Evidence Link:

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Comment ID **HRU2019**

Site ref (if applicable):

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?:

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION Persimmon is the only developer which has met with the site owner for this site. It is not being promoted by any developer as part of this consultation. Very steep topography renders the site undevelopable. Only road frontage is to Wood Lane which Council's Highways Officer's state is too steep with poor visibility. Site is surrounded by Green Belt on all 4 sides. Its allocation would result in Green Belt release beyond the site itself to provide new robust Green Belt boundaries.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5632539>

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Comment ID **HRU2322**

Site ref (if applicable):

Person ID: **1240393**

Name: **Mrs Linda Whitehead**

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:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5636925>

Comment ID **HRU2323**

Site ref (if applicable):

Person ID: **1247030**

Name: **Sean Bamforth**

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 on behalf of the residents of Larch Close, Hebble Vale Drive and nearby houses. I am a local Liberal Democrat Campaigner. Many people have emailed me to explain why they think this development should not go ahead. 1/ This is a very unpopular development. Attached are the 211 electronic signatures and 36 collected signatures of local residents that do not want this land to be developed. 2/ Wood Lane is unsuitable for the traffic it already has, and will be less suitable if more houses are built on this. At busy times, residents have to queue to exit Wood Lane at either end. The speed of the traffic onto Long Lane, and the fact that Wood Lane meets Long Lane on a blind hump makes this more dangerous. 3/ Exit from Wood Lane onto Long Lane is not pedestrianised. The current plan says that there is adequate access to public transport, but this access is via a road which does not have pavements, and as mentioned above, is on a blind brow. Pedestrians walking up this road take their lives into their own hands. 4/ Badgers, bats. It is believed that there are badger setts on the proposed development land, and Bats around Hebble Brook. The land planned for development is also used by birds, deer, foxes and a wide range of wild animals. 5/ Flood Risk. The land above Larch close soaks up a lot of water, and the fear is that any large scale development will increase the chance of run off which will affect both Larch Close and Hebble Vale Drive. Floods 4/5 years ago affected 3 residents and the work took over 3 years to complete due to environmental reports carried out and at a cost of over £500000 paid by insurance. The recent floods caused damage to the properties at the rear of Hebble Vale Drive, and very nearly overwhelmed the bridge over the brook on Wood Lane. (See Attached photographs) 6/ Access after flooding It is worth noting that the Wood Lane bridge running over the brook could easily have been washed away during the recent floods, and there was no access out of Wood Lane at the Fountain Head village end. Any recurrence of the floods in the brook could cut any new development off completely.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5636918> ; <http://calderdale-consult.objective.co.uk/file/5636917>

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Comment ID **HRU3**

Site ref (if applicable): **LP1409**

Person ID: **1121396**

Name: **Mr John Taylor**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Major access issues to this site, Wood Lane access is not appropriate to deal with an additional 150 vehicles and no other access is possible. Already major issues with existing vehicle capacity in this area. Suggest site is visited at peak times to see the existing issues. Destruction of ever decreasing green space.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU366**

Site ref (if applicable): **LP1409**

Person ID: **1242421**

Name: **Mrs Karen Nelson**

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 am very concerned about the plans to build on this land. My main concerns are based on the following;

risk to wildlife, flooding risks, increased traffic danger. Risk to wildlife I have lived here for over 15 years and on 1st October 2019, I saw a badger for the very first time. If you would like any more information about this, please contact me. I have also spoken with Calderdale Badgers about my concern. In the summer months we see bats roosting in the trees on the land. We are an end property and have a good view of this. Bats are seen each evening in the summer period and have been there all the years we have lived here. We regularly see deer in the fields. Flooding risks This area floods. I have lots of video footage and photos of this. The last time was today (9/2/20). The water was up to the top of the bridge. This is a huge risk for us living just below the land. Increased traffic risks Wood Lane is already a massive safety risk with regards to traffic and pedestrians. I have contacted the council on numerous occasions about this. When Brackenbed has a road closure, the volume of traffic increases on Wood Lane and the road cannot cope. My concern is the further amount of traffic if 109 more houses are built. Please look at the top of Wood Lane where it meets long lane during rush hour periods. It's an accident waiting to happen and pedestrians are trying to walk up and down with no path. This already needs urgent attention. Please don't build on this land, it would make the road more dangerous and ruin wildlife areas.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5600229>

Comment ID **HRU421**

Site ref (if applicable):

Person ID: **1242534**

Name: **Miss Joanne Lewis**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Relating to site titled -"LP1409" The proposed site for the 109 property dwellings is on Greenfield land which in itself is destructive to the local nature and wildlife. The road infrastructure surrounding that proposed site, Wood Lane, is narrow, steep and difficult to access and already busier since the construction and therefore increased traffic from Fountainhead Village. Wood Lane and surrounding linking roads are unsuitable for a further large increase in traffic volume that this proposal would introduce. I believe it would make the road more dangerous as visibility is difficult and there is no pavement on Wood Lane or safe access for pedestrians. I believe that building in this area will also increase the risk of flooding as more of the natural defence (trees, grass, foliage) that would ordinarily absorb normal rainfall are removed to build. Existing schools, doctors surgeries, dentists are also not equipped to deal with further increased demand that a further 109 households are likely to bring.

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

Duty to Co-operate Reason:

Suggested Modifications:

Relating to site titled -"LP1409" Please remove the proposal for the 109 properly dwellings and do not build on that site. Do not place existing road infrastructure, schools, doctors surgeries and dentists (who are not equipped to deal with further increased demand that a further 109 households are likely to bring) under excess pressure. Achieve this by not building the proposed 109 property dwellings.

Comments:

Additional Evidence Link:

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Comment ID **HRU426**

Site ref (if applicable):

Person ID: **1139601**

Name: **Ms Nicola Hargreaves**

Organisation:

Agent ID:

Name:

Organisation:

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 can not cope with additional traffic, the road network is not sufficient damage to wildlife and environment noise pollution from building work Alternative brownfield sites should be looked at first.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU428**

Site ref (if applicable):

Person ID: **1242540**

Name: **Mr Richard Tomlinson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Only at present.

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

Sound Reason:

Wood lane is not suitable to take on additional traffic created by the development. This road is already dangerous in its current form and the narrow access bridge to bottom of the road is unsuitable for heavy traffic volumes. Awareness has been raised upon badger setts in the immediate area which would put the badgers at significant risk. Ecology surveys should be made visible and conducted by an independent party. Badgers and their setts are protected under the 'Protection of badgers act 1992' and it is illegal to kill, injure, take or mistreat or tamper with or damage their setts. Alternative areas for housing should be sought away from this area. The waste water infrastructure is potentially at significant risk in this area due to capacity concerns and appropriate modeling needs to be undertaken to ensure that the network is capable of receiving the additional flows. Failure to do so will results in frequent spills via localised CSO's into the beck causing unnecessary pollution events - very bad publicity for Calderdale council should they be the route cause from poor planning procedures. There are also concerns with the diversion of ground water and the effects this could have on local properties, in the small valley. This could lead to more frequent flooding events due to overloaded sewers and the beck.

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

Duty to Co-operate Reason:

At present.

Suggested Modifications:

Based on the outlying risks of the land and area I would suggest to seek housing developments in an alternative area

Comments:

Additional Evidence Link:

Comment ID **HRU458**

Site ref (if applicable): **LP1409**

Person ID: **1242604**

Name: **Mrs Dorothy Tansley**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The proposed development will add 100+ vehicles to the area. Wood Lane is a narrow road with no pavement. The junction with Long Lane is a blind junction with access for only one car at a time. The bridge over Hebble brook is also only wide enough for one car. This causes bottlenecks and tailback for traffic on Wood Lane and Long Lane. The junction with Ovenden Wood Road can also be tricky as it is on a steep incline. In snow and ice, access to Ovenden Wood Road from Long Lane is only possible if you own a 4x4 and sometimes that is not possible. The wildlife corridor will be destroyed. There are many kind of wildlife, some of which are protected such as the badgers and bats. The deer have already been driven off their

previous habitat by the building of Fountain Head Village. We are now seeing the deer being killed on the roads as they try to find a large enough area to live. The herons living the area will now be disturbed and we will lose them also. The greenbelt land in this proposal is currently absorbing a lot of the rain and surface water that comes from the Pellon area. Ovenden Wood Road floods in heavy rain and the then drains into the fields. Wood Lane becomes a river as the water rushes down to the brook. To consider covering all the field with houses, roads and drives will force more water into an already high risk flood area. If you are not aware of the flood risks to the houses on Hebble Vale Drive, I and my neighbours have plenty of photographs and videos of the destruction and devastation that was caused to property on 9th of February when the brook rose by about 10 feet. It is not acceptable to put existing properties at higher risk in order to build new properties.

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

Sound Reason:

This development needed to be withdrawn from the plan. Priority should be given to protecting existing residents from greater flood risk and to protect the local wildlife. The current access roads are not designed for this amount of traffic.

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

Duty to Co-operate Reason:

Suggested Modifications:

Remove this site from the plans

Comments:

Additional Evidence Link:

Comment ID **HRU467**

Site ref (if applicable): **LP1409**

Person ID: **1240393**      Name: **Mrs Linda Whitehead**      Organisation:

Agent ID:      Name:      Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

The narrow road infrastructure is at maximum capacity (Planning has already been approved for two other sites off Long Lane/Lane Ends which will increase the volume of traffic in the area by at least another 100+ vehicles). Inadequate footpath on Ovenden Wood Road/Doctor Hill for pushchairs/wheelchairs. No footpath on Wood Lane. Single track bridge on Wood Lane, and traffic often queueing to get up and down Wood Lane from Long Lane as people are often on the wrong side of road to negotiate difficult junction (approaching Long Lane for a second or two I cannot see the road ahead due to the bonnet of my car and the steepness of the road). At the junction Wood Lane, Ovenden Wood Road, Doctor Hill poor visibility on

steep junction. Destroying green belt and wildlife corridor; deer regularly on this field several times a week. Flooding issues: Hebble Brook is regularly at top of bridge arches during heavy rain and previously destroyed garden walls on Larch Close, and also flooded gardens in Hebble Vale Drive, without more run off being created by housing on the steep hillside above Hebble Brook. Due to steepness of the field any houses built will be looking into the bedrooms of the three storey houses on Larch Close. General infrastructure: dentists, doctors (Meadow Dale Practice due to close shortly) and schools already under pressure, and only one general store in Wheatley. This site needs to be removed from the plan.

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

Duty to Co-operate Reason:

Suggested Modifications:

This site needs to be removed from the Local Plan.

Comments:

Additional Evidence Link:

Comment ID **HRU474**

Site ref (if applicable): **LP1409**

Person ID: **1242672**

Name: **Mrs Claire Shaw**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

No

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

Sound Reason:

The proposed land is not fit for purpose, the top of Wood Lane flooded early this year meaning the gate was opened in to the field to allow for the water to drain in to the field. The new houses would be flooded and will not allow for the water to soak away and will result in the houses on Larch close potentially being flooded as well. More recently on Sunday 9th February the beck could not cope with the amount of water running off the field and resulted in the gardens on Hebble Vale being destroyed. Building more houses will result in problem after problem. Wood Lane is not sufficient to accommodate more traffic, the bridge is a single track use and causes issues now. The land is home to many types of wildlife, deer and foxes to name a couple. Calderdale is running out of green areas and becoming more of a concrete jungle. I do not support this proposal and will devour to prevent it.

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

Duty to Co-operate Reason:

Suggested Modifications:



Comments:

Additional Evidence Link:

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Comment ID **HRU515**

Site ref (if applicable): **Lp1409**

Person ID: **1140261**

Name: **Mrs Jen Clutterbuck**

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:

Flood risk and risk to residents living further on on hebble vale drive, which has recently been flooded in the back garden area from the beck. Flooding risk to any houses built there. It would cause further issues. Greenbelt and wildlife - Greenbelt and precious wildlife such as badgers, deers, bats, foxes, hedgehogs and many birds all reside here some protected and the area should be left alone. Residents enjoy walking through the valley area and seeing the wildlife. Please consider brown areas to build on. There is many other places more suitable Additional traffic risk - the area is only a small valley and additional traffic coming up and down wood lane and using the small road out of the area is too risky, and adding to air pollution and noise

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU7**

Site ref (if applicable): **LP1409**

Person ID: **1121396**

Name: **Mr John Taylor**

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:

Wood Lane cannot cope with increased vehicle capacity (likely to be in excess of 100 cars given the proposed number of houses). No other access is possible and there are issues on Wood Lane now. The site should be visited in peak hours to see the current issues which will only get worse. Road is of lower quality than a B road. Destruction of ever decreasing green space.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU767**

Site ref (if applicable):

Person ID: **1243300**

Name: **Mr Jason Lee**

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 writing to oppose the plan to build extra housing on the green land behind our property. There are several reasons for our decision (personally and for the local area) to strongly disagree with this proposal detailed below. - The proposed site is directly behind our property- building extra houses across this area will have a huge negative impact on local environment and our personal lives. -Noise pollution will most certainly increase. This is a very quiet area especially on a night time. With the increase in local population in this area this will only increase the noise level - Light pollution day decreased Privacy At the moment the rear of our property over looks the Greenland and is in total darkness on a night. We bought this property for the location/privacy and the Greenland views. Building here will highly increase the light pollution rendering the privacy obsolete The rear of our property is the main reason we decided to buy here. The privacy we get from having only green land to the rear of our property is why we purchased. Building property's which will most certainly overlook us from the higher point they will have, will take away our privacy. - Local traffic - the traffic across Wood Lane and surrounding area is heavy as it is. Building new property's here will make the vehicle traffic dramatically increase. Increase in pollution and making the semi - rural area decrease in safety especially for the family's/ children and elderly within this area Wildlife and the Environment - The Hebble valley is a beautiful/ place. There is very little of it left from years of property's been built swallowing up this Green land area. The area can not afford to lose what is the most attractive aspect of it. The semi/rural/ countryside. Local wildlife will be greatly affected. There is a family of deers and various other wildlife such as owls, foxes, badgers etc that live within the proposed build area Where do these go? - Property values - As previously mentioned our property sits directly in the firing line of the proposed build. A substantial percentage of our property's value is down to

the scenery, privacy at the rear of the property. This is almost certain to decrease in value with houses overlooking the rear of ours rather than the green land. This will greatly affect us financially and will have a huge negative affect on our lives. Above are some of the reasons we strongly appose the proposal. There is a wide range of residents angry/ disappointed and nervous about this proposal. If this goes ahead it will have a huge negative impact on the local community, the area and the environment. Given the last few years flood issues and again today maybe funding should be prioritised and aimed at flood defences for our town rather than increasing all the above issues We thank you for taking the time to read our concerns and comments.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU768**

Site ref (if applicable):

Person ID: **1243301**

Name: **Mr Jez Dodd**

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 in regard to the above proposal to build 109 houses on the site on Wood Lane. There are a number of points I would like to raise. > I live in Larch Close which overlooks the Greenfield site. In November 2015, before the Boxing Day floods, we had a prolonged period of heavy rain which filled Hebble Brook to the brim. This caused the collapse of the retaining wall between the garden and brook for 3 properties on Larch Close. Then on Boxing Day, further damage was done and the wall collapsed further. This took over 3 years to be rebuilt due to a lot of structural planning, working with insurance companies and structural engineers. I will not mention the heartache and stress this caused but I only hope you can imagine. The work cost around Â£400k. Also there were delays due to the Environmental Agency needing to attend to check the wildlife in the brook and surrounding areas. > To our knowledge, the brook is home to fish, heron, mink and crayfish (most of which we have seen). There are deer and fox that roam on the greenfield site and recently we've been informed there are badger sets in the fields too. There is a badger set on Larch Close as we have seen the badgers on the road late at night. There are also bats and owls in the trees behind my house. > My reason for writing is as well as the wildlife which is very important, I am extremely worried that building 109 houses on a very steep hillside will cause more pressure and water damage to the houses already in situ on Larch Close. > As well as that, there is no real road infrastructure in place, Wood Lane cannot cope with any more traffic and a number of accidents have already taken place and we are currently awaiting the repair to a lamp post and wall following one such accident ! > This

became even worse when Fountain Head village was built, it's now used as a cut through and rat run. I defy anyone to try and get out of the top of Wood Lane onto Long Lane when the sun is shining directly into your eyes! It's horrendous and very dangerous. It's also dangerous for pedestrians, try walking up or down it without taking your life into your hands! I worry for my own child and other children using the school buses and having to walk down. > Today we have had another deluge of rain and wind courtesy of storm Ciara. I have photos and videos of the Brook which are attached and speak for themselves. > I totally understand the need to build more properties in Calderdale, surely there are more suitable sites rather than Wood Lane. I would like my comments to be noted and acknowledged. If I need to send this anywhere else can you please provide the contact details. I have also copied in Holly Lynch. > You are very welcome to come and visit and view further photos videos or any reports conducted by various agencies.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5607563> ; <http://calderdale-consult.objective.co.uk/file/5607562>

Comment ID **HRU772**

Site ref (if applicable):

Person ID: **1243327**

Name: **Mrs Caroline Blackburn**

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 your proposal to build houses off Wood Lane at the back of larch close I find this outrageous not only is it increasingly difficult, as it is already to exit my property via Wood Lane due to the volume of traffic on a small country road which I might add is so dangerous when I'm trying to take my baby out in the pram no pathways and massive volumes of traffic. Which you are proposing to add another 109 properties to this predicament But also on the 9/2/2020 as you are well aware hebble brook that runs through are properties burst its banks and caused massive devastation to our homes, also the top of Wood Lane had to be closed due to mass flooding which runs into the field at the proposed site. How is adding another 109 properties the this flood prone area going to help this situation that we are in !!!!!!!!!!! In addition to my other email regarding LP1409 a greenfield site at Wood Lane and it's proposed housing this area is inhabited by badgers we regularly have them in our front and back garden and I have also seen them numerous times up Wood Lane

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU820**

Site ref (if applicable): **LP1409**

Person ID: **1243133**

Name: **Mr Ian Barrett**

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:

Ian Barrett. 43 Hebble Vale Drive. With regards to the proposed plans to build 109 houses on the site behind Larch Close (LP1409 Wood Lane, off Ovenden Wood Road, Wheatley, Halifax, HX20TQ . I can not believe that when the government is spending millions of pounds on flood defences, that Calderdale council would allow 109 houses to be built on land above Hebble Brook which already runs at full capacity after heavy rainfall. I have lived on Hebble Vale Drive for 30 years and the level of the water in the brook has never come near the top of the retaining walls, after Fountain Head Village and Larch close were built the level in the brook started to run near the top of the walls after heavy rain and after the storm on 8 and 9 of February the water level came over the top of the retaining walls and caused damage to the properties along Hebble brook, so if more houses are built along the land above the brook the extra rainfall that can not soak into the land anymore would cause the water level to rise even more and cause more damage along the valley. There is also the local wildlife to consider, the wild deer, foxes, badgers, bats and the owls that use the fields as hunting grounds plus the frogs and newts that live in the fields. Plus the impact on the local road system which are already quite busy and when Brakenbed Lane is closed the roads in the area are very busy.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU935**

Site ref (if applicable):

Person ID: **1243667**

Name: **Mr Andrew Stimpson**

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 am writing regarding the proposal to build 109 houses off Wood Lane. Why is the site even being included in the plan when it's already been removed before and nothing has changed to make it a valid option. In fact, increased rainfall through climate change has only added to any concerns regarding flooding. The building of 109 houses would add to the surface water run off impacting on the houses/businesses that run along the valley bottom, several of which have suffered flooding and storm damage in recent years caused by the raised water levels of the Hebble Brook. The bridges and tunnels are under threat as it is. I have photographs showing how close to being breached, the single bridge at the bottom of Wood Lane came during Storm Ciara. Wildlife: The site is still a wildlife corridor. I have seen Badger activity on the land and up and down Wood Lane itself. There are Voles, Foxes, Rabbits, Woodpeckers and Deer on the site. The Deer tend to live among the trees on the old Railway Heritage site that passes through the land. There are Frogs, Toads and Newts in the marsh at the bottom of the proposed site and a variety of birds along the brook itself including Herons and Dippers. In the stream itself, there have been sitings of English Crayfish. Traffic: All the roads around the site are still unsuitable, Maltings, Boy Lane, Wood Lane and Doctor Hill would not come safely with the further increased traffic as they are narrow country lanes and for large parts, have no pavements. There have been several car accidents down Wood Lane they have just recently replaced a lamppost from one and there was a tragedy involving a child on a bicycle on the bend at the bottom of Wood Lane some years ago. The junctions from Boy Lane and Wood Lane onto Long Lane are particularly dangerous for pedestrians and cars. In fact there was a bad accident involving the bus stop on Long Lane where you exit Wood Lane, completely knocking the bus stop over. I would be happy for you to contact me for any further help I can give you regarding the site. My feelings are that if this proposal was to go ahead, it would be disastrous for the area, and it should be removed from The Plan once again.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

## **Main Issues and Council Response**

### **Legal Compliance**

#### Main Issues:

1. Development will infringe on human health and safety for both human life and wildlife.
2. Using Green Belt instead of previously developed land.
3. Inadequate local road network, specifically capacity and congestion on Wood Lane, road safety.
4. Ecology and environmental impact, and effects on wildlife including bats, deer and badgers.
5. Increased risk of flooding.

#### Council's Response:

1. Council Officers from Environmental Health and Ecology have not raised any overriding concerns over health and safety for both human life and wildlife.
2. This issue has been responded to under 'Soundness'.
3. This issue has been responded to under 'Soundness'.
4. This issue has been responded to under 'Soundness'.
5. This issue has been responded to under 'Soundness'.

#### Test of Soundness

##### Main Issues:

1. Inadequate local road network, specifically capacity and congestion on Wood Lane, road safety, limited public transport and lack of facilities for pedestrians.
2. Loss of green space and Green Belt.
3. Ecology and environmental impact, and effects on wildlife including bats, deer, heron and badgers, and species within the brook itself.
4. Availability of brownfield alternatives.
5. Potential for increased crime.
6. Increased risk of flooding, including from diversion of groundwater. Impact on Hebble Brook.
7. Infrastructure - Lack of/pressure on existing amenities, services and facilities in the local area, e.g. schools, shops, doctors, utilities, and public transport.
8. Consideration should be given to brownfield sites.
9. Increase in air, noise and light pollution.
10. Ineffective community engagement.
11. This site is not developable. It is not being promoted by a developer.

## Council's Response:

1. Highways Officers have agreed that Wood Lane is not suitable, however, as stated in the site assessment, the landowners have suggested that access can be taken through land in their ownership from Ovenden Wood Road and under the disused viaduct. Highways Development Management have agreed that this could provide suitable access, and land could be used to improve the Ovenden Wood Road/Wood Lane junction. The Transport Assessment with any submission would need to address the impact of additional traffic and identify mitigating improvements.

The policies within the Local Plan support the achievement of the Local Plan Transport Objective, 'To ensure the provision of a sustainable, safe and efficient transport system which reduces car dependency and improves quality of life through a balance of promoting economic growth, enhancing environments and improving transport access for communities'

To achieve these objectives the Council is developing a range of strategies and interventions, and the Local Plan has a role to play in supporting these, but also ensuring development proposals meet these objectives and contribute more widely to an integrated 'active mode' network.

The IDP proposes a number of key schemes which will allow development in line with the aspirations of Calderdale while reducing the impacts on the transport network. The planned growth has been targeted spatially in areas where access to alternative modes of transport (other than the private car) are best, in order to reduce reliance on cars for travel.

2. The site is currently designated as greenbelt but also performs the function of a natural/semi-natural open space. An assessment of open space in the area shows that there are sufficient alternative natural/semi-natural areas within the 1200m catchment of this site to meet the adopted standards and that there are other greenbelt sites performing this function within the 400m and 600m catchment. However if the site is designated for housing, open space would be required as part of any development since there are deficiencies in other typologies. The visual impact of any development should be considered.

3. In terms of impacts on environmentally sensitive areas, there is a beck to the north east of the site and deciduous woodland to the north west, both of which are UK Biodiversity Action Plan priority habitats. West Yorkshire Ecology has therefore recommended that a buffer zone of 10m is provided from the beck (including gardens of future dwellings). The Council's Conservation (Ecology) Section have commented that there is unlikely to be significant adverse ecological impacts, subject to excluding key habitats and buffers from developable area and appropriate management. This includes a further buffer from the Wildlife Habitat Network, which should be planted with locally native grass seed. A SuDS scheme should take account of existing biodiversity and take the form of fen, marsh, wet grassland or standing water in basins. In addition to the 10m buffer on the beck, it has also be recommended that a 10m buffer is provided on the Wildlife Habitat Network, which should be planted with locally native grass seed.

Policies within the Green Infrastructure and Natural Environment chapter of the Local Plan, specifically Policy GN3, set out a clear and positive strategy to ensure the Council effectively manages its natural environment.

4. With regards to the site assessment process, in order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area, only using the most sensitive Green Belt when all alternative sites were used.

The allocation process requires a willing land owner and developer in order to demonstrate the deliverability of the sites and therefore whilst there are aspirations to use as much brownfield urban land as possible this may not always be demonstrably deliverable.

5. Policy BT5 - Designing Out Crime of the Local Plan ensures that designing out crime and designing in community safety should be central to the planning and delivery of new development. The policy includes a range of criteria that the development proposal must have due regard to.



6. 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.

The indicative developable area lies within Flood Zone 1, but is also subject to surface water flood risk. Development could result in the potential to increase run-off. A Flood Risk Assessment is therefore required. Mitigation could be secured by applying green and blue Infrastructure on site such as Sustainable Drainage Systems and green roofs to reduce the infiltration rate of precipitation as well as provide storage for storm water run-off.

7. The Infrastructure Delivery Plan is a compendium of projected infrastructure provision and it helps to ensure that this infrastructure is provided in a timely manner and in a coordinated and sustainable way. It sets out the infrastructure that will support the level of development that is proposed in the Calderdale Local Plan. The IDP is a living document, updated on at least a yearly basis and contains a chapter on healthcare, education provision, utilities and public transport.

8. The allocation process requires a willing land owner and developer in order to demonstrate the deliverability of the sites and therefore whilst there are aspirations to use as much brownfield urban land as possible this may not always be demonstrably deliverable. In terms of the site assessment process, in order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area, only using the most sensitive Green Belt when all alternative sites were used.

9. Environmental Health has not raised any concerns in terms of the impact of development on air, noise or light pollution levels in the area. However, with regards to air pollution, 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.

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).

11. 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. Has been open and subject to consultation throughout its preparation. The Council considers that the application of the methodology has allowed the consideration of suitable, deliverable, viable sites.

## **Duty to Co-operate**

Main Issues:

Council's Response:

## **Suggested Modifications**

1. Remove the site from the Local Plan.

2. Prioritise previously developed land.

3. Further assessment should be undertaken with regards to flooding.

**Council's Response:**

1. No change required - The allocation of the site is required to meet the Council's housing need. The allocation is considered to be consistent with the Council's site allocation methodology and positioning in the trajectory as set out in the Housing Technical Paper.

2. No change required - In order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area.

3. No change required - Flood Risk Assessment, including Hydrological Assessment and consideration of layout and design would be required at Planning Application stage.

## Representations

Comment ID **HRU121**

Site ref (if applicable): **LP1590**

Person ID: **1125309**

Name: **Mr Geoff 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:

Flooding It appears that no thought has been given to the history of this area with regard to flooding. Highroad Well, Well Royd and The Wells were not given their names for nothing, but due to the amount of underground water in this area. This all comes from the large water table beneath Highroad Well Moor that is constantly fed by surface drainage off the moor as well as underground springs. One of the main aquifers from this leads down to an area underneath The Wells cottages at the top of Stocks Lane. This then feeds through the sandstone bedrock and appears at various points on this site as springs and ground seepage, and also splits to form Warley Clough stream. Before work started on the quarry that is now the gardens to the houses at Braeside, a water course existed to the Churn Lane end of the proposed site that used to go down near the water trough on Brow Foot Gate Lane. This used to join Warley Clough before going under Burnley Road. This process of water flowing from Highroad Well Moor and under the proposed site has been happening for thousands of years and is not going to stop. In fact, it is likely to increase due to climate change. The area of Warley View and Warley Grove are already included in the Environment Agency's high risk surface water flooding area. Any development on this site will increase the risk to this area and the properties lower down in the Kelvin Avenue area. The main issue from surface water flowing on to the site occurs during heavy rainfall when leaves and debris regularly block the drains at the top of both Warley View and Gibbet Street causing the water coming down Roils Head Road and Court Lane to cascade down Warley View and on to the proposed site. This is why this land should be left as a soak away as no amount of drains can cope when blocked with debris. Highways The areas of Warley View, Warley Grove and Gibbet Street are unable to take any more on street parking. After 7pm double parking is a frequent occurrence, leading to local tension. At the mention of snow you will be lucky to find a parking spot until you get near the Horse and Jockey pub. When it does snow or there is even ice on the street, Warley View and Warley Grove become inaccessible. The junction at the top of Warley View has now become an accident black spot and cannot withstand any more vehicles from developments in the area. Accessibility to the site is very restricted. Access from Warley View, a small residential street, is not an option for the large amount of machinery, materials and equipment needed to support the infrastructure to try and develop such a difficult site. This may require the removal of thousands of tons of earth works, prior to possible pilling and the possible construction of retaining walls before any house building even begins. The amount of work required on such a restrictive site would only lead to tension and conflict between contractors and local residents. This has been seen at other sites around the country. These situations arise when councils force through unacceptable developments. Ecology The Ecology of this site has developed greatly over the years leading to the planting of the trees on the site in the million trees scheme supported by the council in the mid nineties. At the time the Treeresponsibility group stated

that Calderdale had the lowest covering of trees in the UK and it was good to see the council taking some responsibility for the environment. It is the lack of trees on the valley sides that leads to the more severe flooding we have seen recently. What is the point in new tree planting schemes to help alleviate the severe flooding we have all seen in recent years if we are going to destroy an already established wooded area on this site? Since the tree planting took place on this site the wildlife population has increased dramatically. This area now attracts visits from local schools, artists and photographers because of the wide variety of wildlife which now resides here, some of which are protected species. These species are protected by law and the other wildlife on site should be protected as a matter of course by those who are in a position to do so, especially our council. What has taken years to create should not be destroyed by a decision taken just to add a few houses and create another eyesore on our hillsides that can be seen for miles around. We have enough of these already due to poor planning decisions in the past. Historic Environment A check on the history of the area will reveal the gardens of the houses at Braeside are on the site of old quarry workings. These workings were eventually abandoned due to flooding from rising ground water. While the quarry was in use, scree and spoil was loosely dumped to the west of the site against a dry stone wall that was built to contain the material within the quarry site. To the south of the quarry the waste was pushed out and allowed to slide down the face of the hill. This changed the contour of the land and now forms a more flat area of land that didn't exist before. Although this waste may have settled over the years this is still loose material not attached to the original topography of the land. This and the spring water must render this land very unstable if any work was to be carried out on this site. Another issue is the likelihood of contaminants on part of the site. The quarry workings were land filled with industrial waste from the local foundries in Highroad Well and spread over a large area. This waste may contain various contaminants associated with foundry waste at that time. The evidence of this waste is easy to find in the garden at 1 Braeside. A full toxicology report on the proposed site may be required before any material is removed. Green Belt This area of land is green belt and is part of the Warley Conservation Area and must be preserved for future generations. It must stay as part of the green belt and not be taken out on a whim and to the detriment of the local community. There are plenty of brown field sites around Halifax at the moment that are eyesores and not suitable for industrial use which are not even included in the development plan. The council must be seen to be putting more effort into using these sites and not just taking the green field option. It is the council's responsibility to its residents to ensure that this process happens. Deliverability Because of the difficult site conditions, I do not believe housing on this site is viable. This was the reason this land was never developed when the Braesides were built. It is also not a site that would interest a major house builder with sufficient resources to overcome the site conditions but it would not stop a smaller builder from attempting to have a go. The problem would then be the long, drawn out timescale of any development. Another problem for local residents would be if the builder ran out of money before overcoming the site conditions and completing the development. This could result in the site being left half built and unfinished, possibly for several years as has been case in other parts of the country. This outcome doesn't bear thinking about. Summary There doesn't need to be an alternative use for this site; its current use as a wildlife haven is just perfect and what the local people want it to remain as. Who would want to destroy a thing of beauty that has taken years to create?

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

Duty to Co-operate Reason:

Suggested Modifications:

Based upon my above comments, I do not believe there is any modification to the proposal that would make it sound.

Comments:

Additional Evidence Link:

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Comment ID **HRU1365**

Site ref (if applicable):

Person ID: **1128101**

Name: **Miss Claire 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:

This plan is not sound for the following reasons: Flooding Warley Clough as well as springs flow down from Highroad Well Moor, under the planned site and surrounding fields, and down to the River Calder. As well as the dampness of the proposed land, Warley View is at high risk of flooding from surface water and Churn Lane is at medium risk (information taken from the Environment Agency's website). The drains on Warley View are often blocked in the autumn months with fallen leaves which cause torrents of water to cascade down the road when it rains. Currently, excess water flows into the field which provides a barrier to stop the water reaching the streets further down such as Kelvin Avenue, Browfoot Drive and so on down to the A646. Building on this site will increase the risk of flooding not only for the new premises but the existing ones on the roads further down the hillside and so it should not be allowed to go ahead. Highways Warley View is too narrow to accommodate access to a new housing development and it is not unusual to see cars double parked. Exiting on to Gibbet Street is difficult due to the bus stop located at the top of Warley View, the cars which are parked whilst people go to the shops or the post office and because of the sheer number of roads which join Gibbet Street in a very small area. Adding more traffic to an already busy area is quite frankly dangerous. Ecology The field has become a haven for wildlife and plants (including protected species) which should not be lost. It is a joy to live so close to nature and it should be preserved for future generations as it greatly increases the quality of life of local residents. Open Space I do not think the physical and mental health benefits of living near open space and far reaching views can be ignored - once this land is gone then it's gone. The bottom of Warley View often attracts admirers, walkers and even school groups to see the view. Environmental Health The houses at Braeside were built on top of a quarry which extended into the field which is subject of LP1590. Digging up this land may affect the local environment as who knows what the quarry was filled with and could also cause landslips into the fields and streets below. The proposed land itself is not flat, probably because of how the quarry was tidied over. Coupled with the flooding risk, I would not have thought that this would be a sensible place to build on. Accessibility Warley View cannot accommodate any more cars, there are no spaces to be found on evenings and weekends and the road frankly isn't wide enough to to provide access either to the residents of a new housing development or to the trucks and building equipment that would be required to build the houses there. Snowy and icy weather in winter sees the residents of Warley View trapped as it is impossible for vehicles to get up to the main road with the only option being to park on Gibbet Street where space is limited. Building in the field below Warley View would ensure that all the residents of the new development would struggle to get out, up Warley View and on to Gibbet Street in bad weather, as would service and emergency vehicles. I fail to see how this site can be classed as suitable when Warley Road simply cannot accept the volume of traffic this new site would bring. Green Belt I think it's appalling that the council can change the boundaries of the green belt because they need to build houses. Green belt should remain green belt and all brownfield sites should be developed first. Point 6.48 states that

"over 200 sites which are brownfield or a brownfield/greenfield mix have been removed from the site allocation process due to one or more of the following: flood risk, site access, ecology or disconnection from the existing urban area". Why hasn't this site been removed for the same reasons? The above points should prove why this land simply isn't suitable to be built on: it is damp land that is narrow with a steep slope and is difficult to access. It should never have been put forward as a prospective site and I am appalled that it is once again being considered.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU147**

Site ref (if applicable): **LP1590**

Person ID: **1130167**

Name: **Mr Mark Forster**

Organisation:

Agent ID:

Name:

Organisation:

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 writing to object to the site LP1590 being proposed, The Wells has just had an application of removal of Listed Building Status denied, I would argue that the setting is one of the significant features of the property which the listed building status is in place to protect. I feel it would be hypocritical to allow building on this site. This is in addition to the wildlife/conservation area & other issues raised by others.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1690**

Site ref (if applicable): **LP1590**

Person ID: **1244160**

Name: **Mr Matthew Denton**

Organisation:

Agent ID:

Name:

Organisation:

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 various reasons why this development should not go ahead (greenbelt reduction, wildlife conservation issues, the site's inability to support the required infrastructure) have already been made clear in the earlier comments. However, I would like to emphasise that site LP1590 was described by the Environment Agency as presenting a clear flood risk. As I type this, Calderdale is recovering from its third heavy flooding event in just eight years. I am baffled that developments on vulnerable sites like this are even being considered.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU2261**

Site ref (if applicable):

Person ID: **1246937**

Name: **Emma Sharpe**

Organisation: **Inspector of Historic Buildings and Areas**

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 FOR FULL REPRESENTATION The site specific considerations for several of the proposed allocations refer to -“consideration of recommendations in the Heritage Impact Assessment” In order for the development of these allocations to be compatible with not only national policy guidance but also the Plan's policies for the conservation of the historic environment, these mitigation measures need to be implemented as part of any development proposals. Consequently, mitigation measures need to be firmly and effectively tied into any eventual site specific policies. Unfortunately, as worded, the policy suggests that development need only 'consider' the recommendations, with no requirement for the design of a scheme to put into effect the proposed mitigation measures. We therefore consider it has not been shown that these sites could be developed in a manner which would not harm the setting of heritage assets in the

vicinity. This is an issue we raised at Publication Draft stage (our letter of 18 September 2018). We are currently working on a Statement of Common Ground with your authority, aiming to agree wording to effectively tie the recommendations of the Heritage Impact Assessments to the relevant Local Plan policies. If it is proposed to proceed with the additional site allocations we recommend this would also apply to those sites.

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

Duty to Co-operate Reason:

Suggested Modifications:

Amend Site Specific Consideration to ensure no harm to setting of heritage assets in the vicinity.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5635295>

Comment ID **HRU31**

Site ref (if applicable): **LP1590**

Person ID: **1124497**

Name: **Dr Lynette Steele**

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 proposed site is greenbelt and provides a woodland habitat to various important protected wildlife. The general aspect of this area will be completely ruined by the building of dwellings on a greenfield site. Moreover, the site regularly floods and any redevelopment of this area would only increase the flood risk of surface water run off with potential landslip issues. Traffic in this area is already heavy due to the junction of Stocks Lane and Gibbet Street and the road network is woefully inadequate to sustain anymore dwellings. Access at the bottom of Warley View and Warley Grove (an unadopted road which regularly has potholes and large areas of loose gravel/stones) would only serve to render these two small roads more dangerous and clogged up with traffic, making parking difficult for any residents living on these two streets and on Braeside. Access via Windle Royd Lane also presents a problem as this road is also inadequate to deal with current traffic levels. Since access to Burnley Road via Churn Lane has been blocked, Windle Royd Lane is the new shortcut between Highroad Well and Burnley Road. There is currently no official footpath/pavement (merely a white line painted on the road which is frequently ignored by motorists). The proximity of a day nursery below St Johns Church means that any children would be at more risk while walking to school. Indeed the listed building status of St Johns Church and other buildings in the area means that this area should be maintained as part of the Warley Conservation area. The development of new dwellings on this site would harm wildlife, protected green spaces and the lives of the residents already living in this area. The infrastructure needed to support new dwellings is not in place and the significant flood risk means that it is not a good site to develop.



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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU32**

Site ref (if applicable):

Person ID: **1240506**

Name: **Carol Grime**

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 am writing to strongly object to the above application. The land is vital to the wildlife, which is often seen in this area. The trees are important to the environment to help the prevention of flooding and give shelter to the wildlife. Building houses would create traffic congestion in an the area that does not have the correct infrastructure to manage the proposed changes. Lifting the green belt status as suggested in planning application LP0417, would be devastating to the area and I would be definitely against this proposal based on the need to save and preserve the land for our wildlife and farm animals.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU990**

Site ref (if applicable): **LP1590**

Person ID: **1119514**

Name: **Mrs Clair Walker**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The land should not be sacrificed for development. Other sites could provide the 16 houses suggested for this site without any need to develop this greenbelt. The land is being proposed not for its ease or access or locality to amenities, nor for any affordable housing as the value of any housing built here would be immediately outside first time buyer pricing due to high build costs and location. The land on LP1590 provides an exceptionally important natural soakaway. Built on the site of a Victorian (and earlier?) Sand stone quarry the site absorbs and filters down a huge volume of water during the flooding seasons in the valley. The "royd" at Windleroyd road is still prone to flooding and the upper fields are a most necessary slowing element to the multitude of springs and wells which are located at the top of the site connecting down from the moors above. To say that a water management assessment of the site is not essential but may be of benefit shows the incredible lack of understanding and appreciation of the vital work undertaken by the land already. Any development of this site would no doubt directly result in flooding to WillowFields and Windle Royd residents. Also to make any attempt to build on a unstable exquarry site is both expensive and difficult, the build would be protracted and the impact to the people living there would be considerable. The roads and parking are already over capacity and the notion of using Warley View as access for heavy machinery and equipment frankly beggars belief. The turning at the top of Warley View already sees a very high accident rate due to the volume of traffic and the mergance of 5 roads at the top of stock lane/Warley View etc already. The land is already home to an abundance of wildlife which has an established safe haven for their homes and which provides a much needed corridor to other green spaces such as West View Park. Despite their already living on the edge of urbanisation it supports and provides homes to families of deers, badgers, foxes, bats, so many different native birds (and a wilded parakeet!?!), hedgehogs, small mammals, insects including a number of types of bees and butterflies etc etc etc. Locals, schools, visitors and tourists come to see the views down to the Church at Warley St Johns and across the valleys as far reaching as the peak district and Leeds on clear days. It features in programmes such as Happy Valley (who film on streets over looking LP1590). It's too big a sacrifice for 16 (or any) homes to warrant removal of greenbelt protection. Previous generations have had the foresight to protect and only develop this land for natural purpose and benefit. The wild natural is able to coexist with the animals (currently sheep) who graze in the field, so it already has an excellent use and purpose and it is well maintained af such. The lower site was planted with trees approx 20 years ago and this has allowed the site to rewild further and the benefit to all has been significant. To offer platitudes of woodland management on the remaining woodland below and to the side of the site after any development, seems ridiculous as any development on any part of it will devastate it as a whole, so fragile and carefully balanced is its existence at present. The site and the adjoining woods and fields is precious and well documented for anyone who wants validity of the lands current status. It should not be built upon but remain greenbelt and given additional protection to ensure this cannot be lifted in future. As such an application for consideration for local green space designation has been submitted which encompasses this site.

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

Sound Reason:

Developing other non greenbelt sites should be given better focus.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

## **Main Issues and Council Response**

### **Legal Compliance**

#### **Main Issues:**

1. The land is Green Belt and should not be sacrificed for development.
2. Land is an important soak-away which helps absorb heavy rain fall.
3. The land is an unstable ex-quarry, which would make development both difficult and expensive.
4. Loss of wildlife habitat.
5. Local infrastructure

#### **Council's Response:**

1. This issue has been responded to under 'Soundness'.
2. This issue has been responded to under 'Soundness'.
3. Environmental Health Officers have not raised any concerns over land stability.
4. This issue has been responded to under 'Soundness'.
5. This issue has been responded to under 'Soundness'.

### **Test of Soundness**

#### **Main Issues:**

1. Loss of Green Belt.
2. Ecology - Impact on wildlife, including protected species.
3. Local Road Network - Inadequate local road network, specifically capacity, road safety and congestion.
4. Increased risk of flooding, building on greenfield land will increase surface water run off. Underground springs. Poor drainage.
5. Heritage - proximity and impact on the Listed Church and Conservation Area. It has not been shown that these sites could be developed in a manner which would not harm the setting of heritage assets in the vicinity. Mitigation measures need to be firmly and effectively tied into any eventual site specific policies.
6. Infrastructure - Lack of/pressure on existing amenities, services and facilities in the local area, e.g. schools, shops, doctors.
7. Site access not suitable for construction traffic.

8. Minerals - site is adjacent to former quarry, could be contaminated on the land.
9. Utilise brownfield sites.
10. The site is not viable.
11. Loss of open space.

Council's Response:

1. The purpose of the Green Belt Review is to provide an understanding of the current strengths and weaknesses of the existing Green Belt and provide the basis for recommendations to change the Green Belt where appropriate. In order to assess Green Belt land against the NPPF purposes, a set of questions for each purpose has been developed including the need to prevent neighbouring towns from merging into one another and to preserve the setting and special character of historic towns.  
In terms of the site assessment process, in order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area, only using the most sensitive Green Belt when all alternative sites were used.  
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. 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.  
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.
2. The Conservation Section (Ecology) has indicated that development would be acceptable subject to various mitigation measures which have been included as site specific considerations. This includes the exclusion of a buffer adjacent to the woodland to be planted with locally native shrubs.
3. The Council considers that the evidence submitted supports and justifies the content of the Local Plan. In addition, the Transport Assessment in any planning application would need to assess impact on local road network.
4. The site assessment process considered the flood risk for this site. It concluded that subject to a Flood Risk Assessment being undertaken at planning application stage. The Council's Drainage Section consider mitigation to drainage issues can be provided including through increasing capacity of the existing drainage network and the provision of SuDS to reduce run off.
5. A Heritage Impact Assessment (HIA) has been carried out in order to assess the impact of development. The Council considers the HIA adequately assesses the impact of development on the Conservation Area and Listed Building and suggests any mitigation measures that may be required. The Council has prepared a Statement of Common Ground with Historic England, and has agreed amended wording for the Site Specific Considerations for sites included in the Publication Draft Local Plan. This wording will be amended for all additional sites in this consultation.
6. The Infrastructure Delivery Plan is a compendium of projected infrastructure provision and it helps to ensure that this infrastructure is provided in a timely manner and in a coordinated and sustainable way. It sets out the infrastructure that will support the level of development that is proposed in the Calderdale Local Plan. The IDP is a living document, updated on at least a yearly basis and contains a chapter on

healthcare and education provision.

7. Access for construction traffic was not raised as a concern by Highways Development Management.

8. Environmental Health Officers have recommended, at Planning Application stage, any development should be accompanied by an appropriate contaminated land assessment, with any mitigation measures identified.

9. With regards to the site assessment process, in order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area, only using the most sensitive Green Belt when all alternative sites were used.

10. The Council does not have any evidence which suggests the site would be unviable. There is a willing land owner on board, and the Viability Study shows that the site is considered viable.

11. The site is currently designated as greenbelt but also performs the function of a natural/semi-natural open space. An assessment of open space in the area shows that there are sufficient alternative natural/semi-natural areas within the catchment of this site to meet the adopted standards. The visual impact of any development should be considered.

### **Duty to Co-operate**

Main Issues:

Council's Response:

### **Suggested Modifications**

1. Develop other non-greenbelt sites.

2. The site should be removed from the plan.

3. Amend Site Specific Consideration to ensure no harm to setting of heritage assets in the vicinity.

Council's Response:

1. No change required - in order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area, only using the most sensitive Green Belt when all alternative sites were used.

2. No change required - The allocation of the site is required to meet the Council's housing need. The allocation is considered to be consistent with the Council's site allocation methodology and positioning in the trajectory as set out in the Housing Technical Paper.

3. Agreed. The Council has prepared a Statement of Common Ground with Historic England, and has agreed amended wording for the Site Specific Considerations for sites included in the Publication Draft Local Plan. This wording will be amended for all additional sites in this consultation.

## Document Section: 12 Mytholmroyd Additional Housing Sites

### **Representations**

Comment ID

Site ref (if applicable):

Person ID:

Name:

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:

Comments:

Additional Evidence Link:

### **Main Issues and Council Response**

#### **Legal Compliance**

Main Issues:

Council's Response:

#### **Test of Soundness**

Main Issues:

Council's Response:

#### **Duty to Co-operate**

Main Issues:

Council's Response:

**Suggested Modifications**

Council's Response:

## Representations

Comment ID **HRU1000**

Site ref (if applicable): **LP0931**

Person ID: **1243833** Name: **Mrs Elizabeth Arrandale** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

I do not have sufficient knowledge to comment.

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

Sound Reason:

I wish to object to the proposed development on the following grounds: Risk of flooding to my property and others: The land is on a steep incline and having living on Carr Field Drive for more than 30 years, I can testify to the fact that my garden (and others) regularly floods in heavy rainfall. I have photographic evidence. With climate change, these events are happening more frequently. Removing the top soil and vegetation from the land for development will only enhance the frequency and ferocity of these events. There are wells and an underground brook within LP0931. Conservation area: Luddenden sits within a conservation area and such a development will lead to there being no boundary between Luddenden and Luddendenfoot. There is a bridleway/ right of way running through this land leading onto moorland and such a development will ruin the visual aesthetics of this local area. There has been much development in recent years within this area and the pressure to build yet more residential units at the expense of ruining the area completely is completely out of kilter and is unnecessary when you consider the availability of the many existing brown field sites that could be better considered. Air quality: a development with up to 44 new residential units will mean additional vehicles - probably 60+ as a conservative estimate but as access to this land is via the proposals at LP1372 (Kershaw Drive) with a further 47 residential units, then an extra 120 + vehicles will require access (plus delivery traffic), which will lead to a poorer air quality affecting young children and the elderly in particular. Roads: The valley roads are not built for yet more development. Traffic is already saturating the valley bottom (A646) and access to Luddenden, Midgley etc is very difficult, such has been the increase in traffic in recent years. Access would then be via Kershaw Drive before travelling down a narrow bottleneck at the end of Dene View. Another concern would be the possibility of using Greave House Fields as a shortcut to gain access to LP0931 which would be dangerous. Infrastructure: It must be assumed that if this land is developed for 44 residential units, then the land at Kershaw Drive (LP1372) will have to be developed for up to 47 units. There is little infrastructure to support existing residents, never mind new residents. Bus services have been cut to the bone, the health centre on Kershaw Drive has restricted opening hours and there is one shop serving the existing community. There are no other shops within 3 miles (Mytholmroyd or Sowerby Bridge). Schools: whilst the schools may be able to cope with an increased capacity, it would undoubtedly lead to more traffic for the school runs etc. Parking is haphazard at best, access is restricted and the air quality would be worse with so many new developments within such a confined space. Personal: as above, Greave House Field is on a steep incline. Any development would lead to an invasion of my privacy and would give me a poorer quality of life, as the occupants within the new development will look directly down on the residents of Carr Field Drive. Any privacy would be completely ruined as a result.



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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609661>

Comment ID **HRU1012**

Site ref (if applicable): **LP0931**

Person ID: **951068**

Name: **Mr Steven Broadbent**

Organisation:

Agent ID:

Name:

Organisation:

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 still cannot see how and why the planning department would think this particular piece of land to be suitable for housing. The land is on a steep gradient, has no direct utilities, no suitable road or transport network, and would surely cost hundreds of thousands to create a road link before any building works could be carried out. I made the following comments in the Local Draft Plan 2017 - Flooding The field has heavy clay soil, and it is on a steep slope, so water can make its own channels and cause flooding. It can be boggy at the best of times. Highways The site cannot be accessed via Carr Field Drive unless relatively new houses are knocked down (thus defeating the object of building more houses). Access to the field via Dene View would require major works, e.g. filling in/bridging a gully. These works would also cause parking and congestion issues for residents and Council employees alike, before any foundations were dug, due to the narrowness of Dene View and its on-street parking issues (there are two schools at the end of Dene View, one being a Special Needs school, with the associated buses). Access via Greave House Fields is very problematical as it is privately owned, steep, narrow, and the junction with Luddenden Lane would require major construction works so that construction traffic could use it, again before the field itself was developed. So, it seems that the only way to access this site is via site 1372 (from the top end of Kershaw). However, this site has already been filtered out of the plan due to "the site performing poorly against a range of different factors". Therefore, what is the plan saying? - that a field (1372) cannot be developed for housing on its own, but can be developed as an access road for another field (0931) which cannot be accessed by any other route. This does not make any sense whatsoever. Ecology The site is greenfield/protected land, forming a natural break between the housing developments of Kershaw and Carr Field, Luddenden, creating a wildlife corridor. Open Space See above comments on ecology. Historic Environment The sites to the north (1561) and to the west (1372) have been filtered out due, in part, to the harming of heritage assets - Greave House and the adjacent barn, at the north-eastern corner of the site 1561, both being Grade II Listed Buildings. Development of this site would also harm these assets. Other Factors Concerns over accessibility for school and doctor's places if the development goes ahead. Brownfield sites should be utilised before attempting to use this piece of greenfield land with such bad

access. Accessibility See comments on highways. Green Belt This field, although not Greenbelt, is greenfield, and is more akin to the filtered out 1561 and 1372 sites. Deliverability See comments on highways. Alternative proposed use for this site. Open Space Please give your reason for alternative preferred use. Re-allocate to Greenbelt. These observations, along with comments by others, caused this site to be filtered out in the 2018 draft of the Local Plan. Even with so called "mitigation", why have they been put back in as the issues surrounding the use of this land for development remain the same? Wouldn't it make more sense to re-develop brownfield sites? In the locality of this area, the site of the Coach & Horses and Springfield Mill, both in Luddendenfoot, could create housing, and there other example of more suitable brownfield land in Calderdale (e.g. an ex-car lot on Queens Road, Halifax) available for re-development on an already existing road, transport and utilities network and without the need for spending hundreds of thousands of tax payers money on excavating and creating a needless development in this field.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1044**

Site ref (if applicable): **LP0931**

Person ID: **1122804**

Name: **Mr Gareth Vickers**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I'm sure that this potential plan is legally compliant. However I do feel that the council has not been at all open about the new plan. No postal notifications have been sent out to residents who maybe affected by this and any other plan. The council has been to reliant on the use of social media which not everyone chooses to use and other than a few small adverts in bus shelters and in the local paper. The information that is available is hard to navigate and appear to be only available online. Not everyone has access to this so many people will not have the chance to voice there objections or support for this plans. The computer Modelling and housing demands that have been set out do not reflect the current coarse that the UK is on. Now we are leaving the EU and the government has made its immigration plans public the potential calculation that are currently being used are out dated. The expected workforce growth is dependent on a very ambitious development plan in Leeds and not local growth. This is a modeled growth plan with no real hard evidence and could leave Calderdale with a property glut if the plan fails to draw in the expected growth. The council should be seen to take this into account and consider keeping with their original plan.

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

Sound Reason:

This area has been rejected on numerous occasions and the issues that were present then are still present

now. There is no usable access to the site other than the privately own drive that leads to the site. This is a single carriageway which has privately owned land on both sides of it. The access from Luddenden lane is restrictive due to the proximity of a blind corner and also the single file traffic on luddenden lane due to on street parking. To gain access to this site it would require the addition of site LP1372. Which has been filter from past inclusion due to it's proximity to a grade 2 listed building. (x2 documents Attached HIA\_LP1372.pdf & LP1372.pdf) The other thing that the council should take into consideration, is that the average Yorkshire household has 1.2 cars this would mean that if an extra 62 house where built an extra 74.4 cars would be using the area. The annual carbon dioxide created by each car is on average produces 4.6 metric tons per year. That would mean that an extra 340 metric tons of carbon dioxide would be released. All of the new household that many be built here would be reliant on a car for shopping and commuting. The proposed increase is partly reflecting the planned Leeds business development plan and other no local plans. If there is a need to travel to any of the new business development people will either drive to train station or directly to work. The council declared a Climate emergency at the beginning of 2019 and are planing to reduce carbon emission by 2050. There is also the road safety issue with the increased traffic trough the Kershaw estate. The increase of traffic both during the construction and there after will put both residents and pupils at risk. The issue of the flood risk and water runoff should be of prime importance to the council and preserving any and all natural water storage should been seen as a priority. The recent flooding that has occurred in the valley is caused by over development of the the valley, with little improvement to the the infrastructure that serves to carry away the storm water. The field in its current state hold far more water than a SUDS system could. So the water retention of the site will be reduced dramatically after the topsoil and subsoil have been removed to develop it. SUDS would help to mitigate a percentage of this lose but not the full amount and the excess will be diverted to the rivers which will increase the levels and risk of flooding in the lower valley. Greave house field also serves as a habitat for wildlife of which many species can be found using it, Mammals, insect, birds all find a home here. It would be a travesty if our need for expansion is given president of that of our fragile natural environment. Its also enjoyed by walkers and horse riders who use the bridleway that has been running across it for hundreds of years. The last time this site was filtered the council stated "There are a number of constraints on the site; the majority can be overcome through mitigation. However, the major constraint is site access. The Council is not aware that agreement has been made regarding access via Greave House Fields. The alternative accesses through adjacent Local Plan site LP1372 is no longer an option as this site is filtered, and the Council's Highways Development Management Section consider that access from Dean View is not suitable. The Council has therefore filtered the site, and it will not be taken forward as a housing allocation". (Document attached LP0931.pdf) The council should be looking to use existing brown field sites and making any owner of builds that are currently not in use to make them available to be developed. The old pud on Brearley has stood abandoned by its owners for years and this is true across the whole of Calderdale. The council should be forcing these to be put back into service, not just making them pay 100% council tax. There should be a emphasis on using areas that have previously been used. A note on mitigation. Although thing can be mitigated it should be asked whether it is right too. We have mitigated many things over the years and some have worked and others have not. Some of the bad mitigation we are now paying for and so is our environment. So if the council continues with this housing plan can they guaranty the mitigation is worth it.

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

Duty to Co-operate Reason:

Suggested Modifications:

The council should be looking to use existing brown field sites and making any owner of builds that are currently not in use to make them available to be developed. The old pud on Brearley has stood abandoned by its owners for years and this is true across the whole of Calderdale. The council should be

forcing these to be put back into service, not just making them pay 100% council tax. There should be a emphasis on using areas that have previously been used.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609685> ; <http://calderdale-consult.objective.co.uk/file/5609676> ; <http://calderdale-consult.objective.co.uk/file/5609675> ; <http://calderdale-consult.objective.co.uk/file/5609674>

Comment ID **HRU1054**

Site ref (if applicable): **LP0931**

Person ID: **1122768**

Name: **Dr Sarah Vickers**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I don't have enough legal knowledge to know whether the plan is legally compliant but I do think that the Council has been very remiss at contacting the members of the community that would be directly affected by the additional housing allocations being put forward. This in its own right may make the plan not legally compliant. Not everyone has access to the internet or the technical ability to work through the council's consultation portal to make comments. Those directly affected by any proposed additional housing sites should have been contacted by post as they were when the original draft of the local plan was put forward in 2017. This has not occurred this time and many of my neighbours are unable to comment. The figures generated for the increase in housing requirement in Calderdale for the duration of the local plan are outdated. Brexit has occurred, there is likely to be less in migration into the area than previously estimated. Job development in Leeds should be supported by houses close to Leeds to encourage sustainable and environmentally friendly living. Transport should be encouraged by foot, bike or public transport and not commuting by car which would be necessary from Luddendenfoot.

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

Sound Reason:

I would like to make the points set out below to reject use of this site in the local plan. Planning permission to this site has been rejected 2-3 times before it was put forward on the local plan. It has consistently been rejected on grounds of access, ecology, preventing urban sprawl, the effects of increasing traffic and pollution and increased flood risks to the already existing population. These factors still exist and are still very relevant. There is no access to the site through Greave house fields which is a narrow, steep, private unadapted road owned by the local residents. If access was achieved through site LP1372 there would be increased traffic past a primary school and very close to a special needs school. There would be a significant increase to local traffic on roads that are not designed for this volume of traffic and increased commuting times. There is no rail link at Luddendenfoot. Any additional housing will bring significantly more cars and traffic into the area. There is no significant employment in the immediate area. People would need to commute to work. Luddenden lane is narrow in places. Burnley road is the only real access along the valley floor. It is already very busy at peak times and commuting times can be long and slow. Additional traffic would be detrimental to people already living and working in the valley. The Luddenden lane/ Burnley road junction already gets congested at peak times. There is a much used bridleway through

the middle of the site which allows horses and walkers access through countryside to connect Midgley and the moors above to Luddendenfoot. It is used multiple times daily allowing local people and visitors to enjoy the nature of the Calder Valley. The site provides a natural break between the villages of Luddendenfoot and Luddenden helping to prevent urban sprawl. If this site was developed there would be increased run off and further risk of flooding in Greave house fields, Kershaw estate, Carr field drive and Luddendenfoot. Some of the properties in these areas have already been flooded during the local storms. We need all the natural resources we can at present to protect the Calder Valley from further flooding. The site would be better used as a green area for the local community and trees planted to help control the water run off. It is already very difficult to get access to a doctor at the local practice, there are already long wait times for an appointment. Further houses and residents in this area will only add to this problem. There isn't the transport or services infrastructure to deal with increased demand which would occur with increased housing in this area of Luddendenfoot. The Local plan states that some of the increases requirement for housing is because of proposed building/ job development in Leeds. The Calderdale council has declared a climate emergency, building houses in an area that requires a commute by car and in a flood risk area doesn't make sense.

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

Duty to Co-operate Reason:

Suggested Modifications:

The council should look at other brownfield sites prior to considering this site. There are also sites from old pubs and mill buildings that have been derelict for a while and should be considered for redevelopment before encroaching on the natural environment. Multiple smaller sites would still allow for additional housing without the massive influx of houses and traffic into one location. I would propose the site be designated 'Local Green space' for many of the reasons listed above, including its proximity to the local villages of Luddenden and Luddendenfoot and its recreational value with the bridleway running through it. Also its ability to act as a buffer between Luddenden and Luddendenfoot, preventing urban sprawl and as wildlife corridor.

Comments:

Additional Evidence Link:

Comment ID **HRU1165**

Site ref (if applicable): **LP0931**

Person ID: **1121663**

Name: **Mrs Jill Pickles**

Organisation:

Agent ID:

Name:

Organisation:

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 make comments on the proposed Mytholmroyd additional housing sites for the draft local plan. I am concerned about the proposed development because: For at least 40 years this area was designated

Green Belt making a distinct separation from Luddendenfoot to Luddenden Village. It is used as by Walkers, Horse Riders, Runners and Dog Walkers every day. There is a bridleway which crosses the land used regularly by horse riders and with the extravehicles this development would generate will be dangerous. The area is also well used by Walking Groups who use the village car park to enjoy this green area of countryside. The proposed entrance to this site would generate a huge number of vehicles passing the Primary School & Special School therefore causing a potential danger to Children Parents & Visitors to the Schools. There is already problems of access to schools in the area, which will be intensified by this plan. The hillside on which this large number of houses will be built is an extremely wet one. Already water problems have occurred towards the boundary with Carr Field Drive. A large amount of drainage planning would have to be made. The number of houses proposed on this development is far too large to add to Village area. Many Services would not be able to cope with the number of people coming into the Community, eg The Health Centre & The two Schools. There are other sites in the area much more ready for building on without having to take away this area of countryside from the village of Luddenden, eg The land at the former Coach & Horses Public House in Luddendenfoot and the land at the former Clog Factory in Mytholmroyd. I should be grateful if you could take these points into consideration.

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

Duty to Co-operate Reason:

Suggested Modifications:

See previous comments

Comments:

Additional Evidence Link:

Comment ID **HRU1204**

Site ref (if applicable): **lp0931**

Person ID: **1243875**

Name: **Mrs Marsden Marsden**

Organisation:

Agent ID:

Name:

Organisation:

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 boggy, even after a dry spell, and so holds a large amount of water which helps to prevent flooding. If the fields were developed then this would lead to an increase in run off which would impact on the nearby houses which have already had flooding in their gardens. Luddenden lane is a narrow road with sharp bends and blind corners. Cars are parked on the roadside, especially at Grove Crescent and at the junctions at the Top of High Street and Thorn View. There are several junctions including Carr Field Drive and Greave House where visibility is poor and drivers have to come far out into the main road in order to see on coming traffic making it dangerous for drivers and pedestrians. The pavements are narrow in places and come to an end near the entrance to Carr Field drive, making people cross over on a blind corner. This is particularly difficult for people taking children to school. Extra traffic would only make a bad situation

worse, especially at busy times Several years ago the residents had a survey of these fields done, which showed a large variety of native flowers and grasses, all of which support invertebrates and birds. The land isn't grazed and has become ideal habitat for wild life. Land Calderdale says it wants to protect. Greave House was designated as protected open space, and is enjoyed by local residents, walkers and riders. When viewed from the top of Halifax Lane, Luddenden village and Luddenden Foot can be seen as two separate settlements. Because of more recent developments , Greave House Fields are all that is now keeping this separateness. To build on them would make a solid block of houses incorporating the conservation village into a much larger and increasingly urban setting.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1226**

Site ref (if applicable): **LP0931**

Person ID: **1128948**      Name: **Mr Paul 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?: **No**

Sound Reason:

Flooding Drainage is a problem with this land. There were serious problems some 7 years ago with an extremely large volume of surface water flowing off the land. Apparently there was a blocked land drain in the field which remained so for several weeks. It must have been difficult to locate, which raises the question of what drainage system exists across the land. This caused damage to the garden of our property and also to the garage, through which a constant stream of water flowed during rainy periods. It is perhaps notable that the original meaning of 'Carr' is: 'an area of bog or fen'. During heavy rain there is still much surface water coming off the field and on to the gardens causing water-logging. Given the amount of flooding and problems with subsidence that have been evident locally, the problem of landslip on development of this boggy waterlogged field cannot be underestimated. Development of this site for housing would directly and severely increase such risk on this land and consequently to the adjacent properties. The floods locally this month only serve to emphasize this problem and there is again a constant flow of water coming off this land and into Carr Field Drive. Highways This area of Luddenden Lane is already busy and there are problems with the 20mph speed limit being respected. This is likely to be exacerbated and result in a dangerous stretch of road. The junction with Luddenden Lane and Burnley Road is already a bottleneck and the substantially increased traffic will make this even worse, especially as there is usually only one line of traffic available at the junction due to parked cars on one side of the road. If the bus service is increased this will make matters even worse. Infrastructure The local GP practice

already cannot cope with the volume of patients, this development will only make this worse. Ecology This is a wildlife corridor. Foxes, rabbits, stoats, cats, deer and many species of birds and insects use the land. Open Space There is an established bridleway across the land and it has for many years been regularly used by dog walkers, hikers and runners, certainly over the 27 years since I have been living here. Other Factors There are other brownfield sites suitable for development in nearby areas. It is far better to bring old buildings back into use and restore the area's heritage at the same time as providing additional accommodation. The main living rooms of the properties on Carr Field Drive adjacent to this land face on to Greave House Field. Due to the steep slope of the land this will cause overshadowing of these properties.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1256** Site ref (if applicable):

Person ID: **954051** Name: **Miss Elaine Walker** 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:

Given the current issues with flooding in the valley it is time to call a moratorium on new developments in this area. The combination of the flood defence works in Mytholmroyd and new developments will exponentially increase the risk of flooding to homes and businesses in the Luddenden/Luddendenfoot area and further downstream. In addition to this risk, it is clear that the current resources for schools and healthcare provision in the area are inadequate to meet the demands of the current population and the road and sewerage systems are already at capacity. Besides the threat of flooding and lack infrastructure, these potential sites are in the Greenbelt. If it is agreed to add these sites to the Local Plan it leaves the door open for further developments on greenbelt sites across Calderdale and countrywide, harming the environment, reducing air quality, and damaging fragile ecosystems and wildlife. Perhaps rather than looking at ways to increase housing stock it is time to look at the issue from a different angle - investing in family planning and promoting the benefits of having fewer children, helping to reduce the population and therefore the demand for housing whilst protecting the environment.

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

Duty to Co-operate Reason:



Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1292**

Site ref (if applicable): **LP0931**

Person ID: **1243927**

Name: **Mrs Helen Tempest**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

see below

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

Sound Reason:

Housing Growth The Local Plan was drawn up between 2016 and 2018, with amendments made in October 2019. We have now left the EU. The housing projection used in the Local Plan is no longer valid. Reduced immigration will lead to a reduction in the amount of new housing required and therefore reduce the need to release Green Belt and greenfield sites. Negative impact on the Green Belt The NPPF Chapter 13 states -“ The Government attaches great importance to Green Belts “-“ local planning authorities should ensure that substantial weight is given to any harm to the green belt “-“Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified “-“Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances”. -“ a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt “-“ 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. “-“ Whilst accepting this site is not greenbelt, access is only possible via adjacent site LP1372 which is greenbelt, so when reviewing these in conjunction, development of the sites is contradictory to all of these statements. I do not see any exceptional circumstances evidenced or justified in these proposals to allow building on Greenbelt land LP1372. There are many other sites within the Calderdale catchment that do not sit within Greenbelt Land that could be considered for development before ruining forever the Greenbelt Land in this site. Some sites have been removed from the plan simply because developers do not want to develop these sites as profits are not as high or as a developer is not currently available. This is not a good reason for destroying highly sensitive green belt and does not constitute exceptional circumstances. I consider the proposal is contrary to NPPF 134 -“Green Belt serves 5 purposes: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land “-“Calderdale Council, in its own words in their filtered site assessment, concluded -“this area of Green Belt performed well against these five Green Belt purposes “-“ The proposed development of nearly 100 new homes (together with adjoining site LP1372) will lead to urban sprawl, linking the villages of Luddenden Foot and the conservation village of Luddenden. It will destroy the setting and special character of the consideration village of Luddenden. It also encroaches on

important green space, removes natural habitat and takes away an integral part of the wildlife corridor (against NPPF 174). The function of the Calderdale Council Planning Department is to facilitate sustainable development that make a positive contribution to the local environment. It is NOT the role of the Council to make unacceptable sites within the Green Belt available, to meet their housing targets. Why have the council not carried out and published a detailed Green Belt Review survey for this site, such as that attached to LP0196 in the draft plan? Other potential sites within the valley include -the former Coach and Horses, -The former Grove Inn at Brearley, -The former White Lion in Mytholmroyd, -Walkleys Mill at Mayroyd, -the former Woodman at Charlestown If the owners are not taking positive steps to bring the site into residential development then the action the Council is taking under its powers within Calderdale Council's Empty Homes strategy 2014 ; 2020 should be more visible.

**Flooding** The current policy and legislation on flooding states -“ due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere. Chapter 14, paragraph 163 of the NPPF states: -“ When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere” The continued flooding issues experienced in the upper Calder Valley is well documented. The proposed development will increase run-off water into the River Calder at Luddenden Foot, which flooded in early 2020, with a further flood warning 2 weeks later. This land soaks up a vast quantity of rainwater and there are natural springs that pop up all over the hillside. Disrupting these natural springs will cause the water to simply be diverted elsewhere, causing certain flooding further down. I urge the decision makers to think logically and show some common sense in realising that you cannot keep taking away the natural flood plains without it causing devastating consequences. Para 158 NPPF states ' Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding '. I do not see any evidence that the authority has exhausted other options of seeking development sites in lower risk flooding areas or sites that will not cause further flooding elsewhere.

**Loss Wildlife Corridor** This site with the adjoining site LP1372 is a wildlife habitat for many, many different species including deer foxes and bats. NPPF Chapter 15 states that planning policies and decisions should contribute to and enhance the natural and local environment by : protecting and enhancing valued landscapes and sites of biodiversity. It also states - to protect and enhance biodiversity and geodiversity, plans should: identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including wildlife corridors. Developing these sites will put this precious wildlife corridor and all its inhabitants at great risk directly opposing the NPPF legislation and the DEFRA 25 Year Plan. Para 177 NPPF states that ' The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site'. Building on the land included in this and the adjoining site LP1372 will be extremely detrimental to the wild animals within the area. No mitigation can prevent the impact of urban sprawl and the destruction of natural habitats.

**Air Pollution and Traffic Congestion** The development of this site will undoubtedly impact the Luddenden Foot AQMA that already exists and the other 6 AQMAs detailed in the local plan at 21.11, as residents travel to work both within the local area, plus all access roads to the motorway go through further AQMAs. Highways In one of the filtered sites at Mytholmroyd LP1519, which was to provide c.100 residential units, Highways England stated that development of the site -“should not be commenced until completion of the Route Improvement Schemes programmed to start in the current roads period (2015/16-2019/20).” Yet the total number of new homes in this and the adjacent site LP1372 is a similar number. How does any development in the valley therefore make sense until completion of the Route Improvement Scheme, when considering the cumulative effect rather than at individual site level? Consultation Development of this site is only possible using access from adjoining site LP1372 which was a rejected (filtered) site in the draft 2017 local plan, meaning many residents would not have felt the need to comment. In the original site assessment for LP1372, the council stated -“ The site falls within a Special Landscape Area where

development could harm the landscape and the site performs well against the Green Belt Purposes. Due to the site performing poorly against a range of different factors the recommendation is that the site be filtered from being allocated within the Local Plan "The Council have now gone against their own original recommendations. LP1372 has been included in the revised plan at the last minute, with little consultation or advertisement (no public meetings etc.). When considering that the council themselves own this site and will therefore derive income from its sale, and that it seems to have been included with the sole purpose of resolving access issues related to adjacent site LP0931, is nothing short of disgraceful. Calderdale Council has not been helpful or open about this new consultation period and have failed to make the residents aware of the need to submit new objections to the amended Local Plan and the timescales for this. The Council probably hoped that the amended local plan (with the additional sites included) would slip through un-noticed and unchallenged. I do not consider that Calderdale Council have acted in a fair, open, honest and transparent way in regard to the amendments made to the Local Plan

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

Duty to Co-operate Reason:

see above comments

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1554** Site ref (if applicable): **LP0931**

Person ID: **1244125** Name: **Mr Richard Wilding** Organisation:

Agent ID: Name: Organisation:

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 a number of concerns about the proposals: 1. Additional housing will be located on a sloping site, which is highly likely to contribute to further/faster water run-off which will potentially lead to increased risk/frequency of flooding. Luddenden Lane, between Greave House Fields and Kershaw Drive already floods during heavy rain as well as Burley Road at the bottom of Luddenden Lane. 2. The proposed new houses will increase the volume of traffic using Luddenden Lane, which is already a very busy road, given its size. This will have an impact on road safety and there is likely to be a much greater bottle-neck at the bottom of Luddenden Lane, both joining and leaving Burnley Road. 3. Re-using sites that are currently not in use, such as former Springfield Camping site or former Coach & Horses pub would be a better solution than building on green-field sites.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1750**

Site ref (if applicable): **LP0931**

Person ID: **959786**

Name: **Mrs Christine Goodman**

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:

LP0931 I would like to make comments on the proposed Mytholmroyd additional housing sites for the draft local plan. My family and I have enjoyed living in Carr Field Drive for over 20 years. My son attended the local village school at which I now work. I am concerned about the proposed development because: 1) The area is a very special part of the Green Belt and the fields are used on a daily basis by walkers, runners and dog walkers. It is a green space for the village and many other local walking groups who park in the village car park and enjoy the countryside. 2) The increase in traffic around both the primary school and special school would be a danger to children and other members of the community. It would also cause even more of a bottleneck at the bottom of Luddenden Lane where it meets the Burnley Road causing further delays for village residents and for other users of the Burnley Road. 3) Additional housing would add to the rain run off from the hillside and cause flooding. This has already been a serious problem for a number of people in our road and I'm concerned it will lead to more flooding both for Carr Field and residents of Dene View in particular. 4) The site of the former Coach & Horses at the bottom of Luddenden Lane/ Burnley Road has remained undeveloped for many years so I would question the necessity of building on a Green Belt area of beauty before making good use of this unused site. Please carefully consider the above points before going ahead with this local plan.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1805**

Site ref (if applicable):

Person ID: **959186**

Name: **Mr. Rodney Collinge**

Organisation: **Luddenden Conservation Society**

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:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5619050>

Comment ID **HRU1825**

Site ref (if applicable): **LP0931**

Person ID: **1139168**

Name: **Mr Roger Barker**

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 wish to make the following comments on the proposal highlighted above: House building on this land will destroy the natural boundary between Luddenden Foot and Luddenden thus creating one continuous conurbation. The character of this important historical conservation area will be ruined. The area is very much used by runners, walkers, (including local walking groups) and dog walkers. In addition the ecological impact on the variety of wildlife must not be underestimated. Many deer give birth and rear their young here. Obtaining a doctors appointment at the local surgery currently takes three to four weeks, this is an unacceptable time anyway, but with additional housing this time will be exacerbated both on the Greave House Field and Kershaw Sites. Increase in traffic will create additional problems particularly at the bottom of Luddenden Lane, but more importantly greater safety risks, particularly for children many of who walk to school. Local Schools cannot accommodate additional pupils. Further work should be carried out to identify and utilise Brownfield sites, such as the old Sagar Richards land, the old Clog factory between Mytholmroyd and Hebden Bridge: not forgetting the land that has been empty for many years at the site of the old Coach and Horses public house at the bottom of Luddenden Lane. There is huge concern that

any housing development will increase the runoff of rain from the hillside and cause yet more flooding. This is already an issue, particularly in view of the increasing severity and frequency of heavy rainfall. We ourselves experience this every time we have very heavy rain: water runs from the hillsides flooding our gardens.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1903**

Site ref (if applicable): **LP0931**

Person ID: **1246443**      Name: **Catherine Williams**      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:

We wish to make the following comments on the proposal highlighted above: House building on this land will destroy the natural boundary between Luddenden Foot and Luddenden thus creating one continuous conurbation. The character of this important historical conservation area will be ruined. The area is very much used by runners, walkers, (including local walking groups) and dog walkers. In addition the ecological impact on the variety of wildlife must not be underestimated. Many deer give birth and rear their young here. Obtaining a doctor's appointment at the local surgery currently takes three to four weeks, this is an unacceptable time anyway, but with additional housing on both Greave House Field and Kershaw sites, this will be exacerbated. Increase in traffic will create additional problems particularly at the bottom of Luddenden Lane, but more importantly greater safety risks, particularly for children many of who walk to school. Local Schools cannot accommodate additional pupils. Further work should be carried out to identify and utilise Brownfield sites, such as the old Sagar Richards land, the old Clog factory between Mytholmroyd and Hebden Bridge: not forgetting the land that has been empty for many years at the site of the old Coach and Horses public house at the bottom of Luddenden Lane. There is huge concern that any housing development will increase the runoff of rain from the hillside and cause yet more flooding. This is already an issue, particularly in view of the increasing severity and frequency of heavy rainfall. We ourselves experience this every time we have very heavy rain: water runs from the hillsides flooding our gardens.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU2262**

Site ref (if applicable):

Person ID: **1246937**

Name: **Emma Sharpe**

Organisation: **Inspector of Historic  
Buildings and Areas**

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 FOR FULL REPRESENTATION The site specific considerations for several of the proposed allocations refer to -“consideration of recommendations in the Heritage Impact Assessment” In order for the development of these allocations to be compatible with not only national policy guidance but also the Plan's policies for the conservation of the historic environment, these mitigation measures need to be implemented as part of any development proposals. Consequently, mitigation measures need to be firmly and effectively tied into any eventual site specific policies. Unfortunately, as worded, the policy suggests that development need only 'consider' the recommendations, with no requirement for the design of a scheme to put into effect the proposed mitigation measures. We therefore consider it has not been shown that these sites could be developed in a manner which would not harm the setting of heritage assets in the vicinity. This is an issue we raised at Publication Draft stage (our letter of 18 September 2018). We are currently working on a Statement of Common Ground with your authority, aiming to agree wording to effectively tie the recommendations of the Heritage Impact Assessments to the relevant Local Plan policies. If it is proposed to proceed with the additional site allocations we recommend this would also apply to those sites.

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

Duty to Co-operate Reason:

Suggested Modifications:

Amend Site Specific Consideration to ensure no harm to setting of heirtage assets in the vicinity.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5635295>

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Comment ID **HRU602**

Site ref (if applicable): **LP0931**

Person ID: **1243000**

Name: **Mr Ian 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:

Access via Greave House Fields - Dangerous & Impractical .Access to the proposed development - if through Greave House Fields is practically impossible and dangerous given access off Luddenden Lane is on a poorly sighted bend, sharp bends on the current bridleway between properties and with insufficient width to accommodate a two sided road as well as a steep, direct gradient that would be necessary to access the proposed site. There is not enough space which is why historically access has always been seen as a problem. The pathway is a bridleway which enjoys regular activity and it would be a poor environmental decision to allow the widened road access necessary to share space with the bridleway given the steepness of access with horse present would be dangerous. There is also a problem with excess water coming down the hillside along Greave House Fields already a problem with reported drainage problems. Further pressure on the drainage system will be problematic to all properties in the area and would increase the risk of flooding.

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

Duty to Co-operate Reason:

Suggested Modifications:

The proposed site access should logically be through the Dene View (or a spur off it) or even through Ellen Road Lane.

Comments:

Additional Evidence Link:

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Comment ID **HRU649**

Site ref (if applicable): **LP0931**

Person ID: **1242636**

Name: **Mrs Diana Ellis**

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 make comments on the proposed Mytholmroyd additional housing sites for the draft local plan.



We have lived in Carr Field Drive for over 20 years and brought up three children here who all attended the local village school. I am concerned about the proposed development because : 1)The area is a much - loved and used part of the Green Belt; walkers, runners and dog walkers use the fields many times every day; it is a green lung for the village and indeed for many other local walking groups who park in the village car park and enjoy the countryside. 2) The increase in traffic around the primary school would be a danger to schoolchildren and other members of the community. It would also cause even more of a bottleneck at the bottom of Luddenden Lane where it meets the Burnley Road causing further delays for village residents and for other users of the Burnley Road. 3) Additional housing will add to the rain run off from the hillside and cause flooding. This has already been a serious problem for a number of people in our road and I'm concerned it will lead to more flooding both for Carr Field and residents of Dene View in particular. 4) The proposed development is far too dense for the area and I do not accept there is this level of demand in the area eg the site of the former Coach & Horses at the bottom of Luddenden Lane/ Burnley Road has remained undeveloped for many years. I should be grateful if you could take these points into consideration.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU66**

Site ref (if applicable): **LP0931**

Person ID: **1126233**

Name: **Mr Scott Patient**

Organisation:

Agent 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:

Both sites within the Luddendedfoot ward have access and potential surface water/flooding issues. I trust these will both be adequately dealt with first. SUDS should be mandatory and throughout on both schemes should they ever progress.

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

Duty to Co-operate Reason:

Suggested Modifications:

Both sites within the Luddendedfoot ward have access and potential surface water/flooding issues. I trust these will both be adequately dealt with first. SUDS should be mandatory and throughout on both schemes

should they ever progress.

Comments:

Additional Evidence Link:

Comment ID **HRU797**

Site ref (if applicable):

Person ID: **957530**

Name: **Mr. Rodney Collinge**

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 number LP0931 at Greave House Fields, Luddenden I wish to object to the inclusion of this site in the plan for the following reasons: The site has traditionally delineated the boundary between Luddendenfoot and Luddenden, which are two separate communities. A development here will destroy this and just create a ribbon from Luddendenfoot all the way to Midgley This building of 44 dwellings here will create even more of a problem obtaining appointments at the nearby Health Centre. It is now almost impossible to get an appointment with either a doctor or a nurse unless it is for an extreme emergency in less than 3 to 4 weeks. The development will almost certainly place a minimum of an extra 60 vehicles on the surrounding roads which already are taking vastly well in excess of what they are designed for. It is now commonplace for queues of teens of vehicles to be waiting at the bottom of Luddenden Lane to try to gain access to the A646. Similarly, the extra traffic passing a junior school and a special school will be an extra hazard for children to negotiate as they cross the road there. The bridleway which crosses the land is frequently used by riders. Mixing horse traffic and motor vehicles is not exactly to be welcome by either driver or rider. There will be increased run-off of water. Given the frequency with which the drains are cleared by the local authority, this water will greatly increase the chances of flooding of the houses at Greave House Fields, and the possibility of consequent action against the authority. There is already problems of access to schools in the area, which will be intensified by this plan. Possible extra sites for housing. I note that no figure has been given for the number of extra dwellings required in each area. However, as the above two sites are the only ones mentioned for the Mytholmroyd area, we are assuming that in the region of 80 to 90 new dwellings are the total requirement. We would suggest that this figure could be met without either of these two sites being needed by using the following land. One site mentioned as a possibility for industrial and housing site is at Top Land, Mytholmroyd. One would assume that the industrial development would be in the area which appears to be covered by huts. At a 'guess', that leaves in the region of 5 hectares of land which could be developed for housing. Recently, the ex-Springfield Camping mill outlet in Luddendenfoot has closed down, with a possibility of that being converted into apartments, maybe 6. The demolition of the mill at the ex-Walkley's Clog factory at Hawksclough has left a site which could be developed for housing, with suitable precautions taken for flood risk. In fact, we don't think flooding has taken place there even though it is next to the river. This would take 8 dwellings. The site of the old Sagar Richards industrial complex at Luddendenfoot has not been fully explored for housing development. This could also take place between the entrance road to Tenterfields and the existing dwellings opposite the school. Use of such sites as these would totally obviate the use of land at Greave House Fields and

Kershaw, which I am sure can only be described as first class amenity land, particularly compared to alternatives. We would strongly urge the exploration of alternatives than going to the easy targets of prime undeveloped green land.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU828**

Site ref (if applicable):

Person ID: **955696**

Name: **Mrs Christine Wardle**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

This site will need to accessed through what is now designated Green belt. National planning policy states that Green belt must not be built on except in 'exceptional circumstances'. This site has been selected because the land owner wants to develop it to make money and it is a cheap and easy option but presents far from 'exceptional circumstances'. Please refer to my comments on the proposal for Kershaw Drive fields (LP1372)for further detail since these 2 development sites go hand in hand.

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

Sound Reason:

Please refer to my comments on LP1372

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

Duty to Co-operate Reason:

The consultation period is rushed and not well communicated to interested parties. This online platform is not easy to use and deters objectors.

Suggested Modifications:

Please refer to my comments LP1372. A detailed investigation is needed regarding the Brown field sites in Calderdale and consideration of change of use from business to residential development. An example of this would be the old Sagar Richards site which does not have good access for modern commercial lorries but would be suitable for domestic vehicles.It is flat and any development would enhance the area not detract from it.

Comments:

Additional Evidence Link:

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Comment ID **HRU929**

Site ref (if applicable): **LP0931**

Person ID: **1238595**

Name: **MR Michael Wardle**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

This site has already been refused in the previous plan and had planning refused on a number of occasions before that. Its refusal was based partly on access being shared with two schools and narrow roads. I object to the inclusion of this site in the plan because these issues have not been resolved and in fact are being made worse because the proposed solution is to develop more and into "Green Belt" to gain access via a more circular route. The sites LP1372 and LP0931 should be considered together because their impact on the local community and environment is compounded by the sum of their size. 94 house with at least 94 cars which increases the size of the Kershaw estate by at least 25% and is going to have a major impact locally.

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

Sound Reason:

Building on this site will destroy the boundary between Luddendenfoot and Luddenden and so it will become one continuous ribbon development around the hill side losing the character of local historically development of the Villages. Luddenden is a conservation area. The site will remove the nature corridor that much wild life uses to cross the Luddenden Valley. The site is not sustainable because it will increase the stress on an already over stretched local infrastructure. The majority of access to the site will be via private vehicles because of its situation up hill and its distance from shops, bus stops, railway stations and other towns. Access is past local schools where the increased traffic will cause more pollution. There has been no improvement to local roads or transport to date and little seems planned to make a development of this size environmentally sustainable. Building on the site will increase flooding because the land will not absorb water during periods of heavy rain. This will increase the pressure on the present system which already cannot cope as demonstrated in the recent floods. Local roads were flooded because of the amount of run off. Removal of any hedges and trees will increase the risk of land slip which has occurred along the east boundary of the site and in the adjacent fields above. The Bridleway that crosses the site will lose its character and pedestrians, horses and bikers will mix with car traffic.

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

Duty to Co-operate Reason:

The time scale set out for all parties to investigate and fully consider the implications of these new proposals does not in my view demonstrate a "duty to co-operate". They are being rushed through.

Suggested Modifications:

This site has already been considered and refused. The reasons for the refusal have not changed. The development of the site should be refused. Alternative brown field sites should be used such as Springfield Camping, Sagar Richards and the old Clog Factory. There are many others in Calderdale. There has already been much "Wind Fall" development locally the impact of which needs to be investigated and considered

along side these developments.

Comments:

Additional Evidence Link:

Comment ID **HRU997**

Site ref (if applicable): **LP0931**

Person ID: **952011**

Name: **RT Arrandale**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I do not have sufficient knowledge to know whether the plan is compliant.

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

Sound Reason:

I wish to object to the proposed development on the following grounds: Risk of flooding to my property and others: The land is on a steep incline and having living on Carr Field Drive for more than 30 years, I can testify to the fact that my garden (and others) regularly floods in heavy rainfall. I have photographic evidence. With climate change, these events are happening more frequently. Removing the top soil and vegetation from the land for development will only enhance the frequency and ferocity of these events. There are wells and an underground brook within LP0931. Conservation area: Luddenden sits within a conservation area and such a development will lead to there being no boundary between Luddenden and Luddendenfoot. There is a bridleway/ right of way running through this land leading onto moorland and such a development will ruin the visual aesthetics of this local area. There has been much development in recent years within this area and the pressure to build yet more residential units at the expense of ruining the area completely is completely out of kilter and is unnecessary when you consider the availability of the many existing brown field sites that could be better considered. Air quality: a development with up to 44 new residential units will mean additional vehicles - probably 60+ as a conservative estimate but as access to this land is via the proposals at LP1372 (Kershaw Drive) with a further 47 residential units, then an extra 120 + vehicles will require access (plus delivery traffic), which will lead to a poorer air quality affecting young children and the elderly in particular. Roads: The valley roads are not built for yet more development. Traffic is already saturating the valley bottom (A646) and access to Luddenden, Midgley etc is very difficult, such has been the increase in traffic in recent years. Access would then be via Kershaw Drive before travelling down a narrow bottleneck at the end of Dene View. Another concern would be the possibility of using Greave House Fields as a shortcut to gain access to LP0931 which would be dangerous. Infrastructure: It must be assumed that if this land is developed for 44 residential units, then the land at Kershaw Drive (LP1372) will have to be developed for up to 47 units. There is little infrastructure to support existing residents, never mind new residents. Bus services have been cut to the bone, the health centre on Kershaw Drive has restricted opening hours and there is one shop serving the existing community. There are no other shops within 3 miles (Mytholmroyd or Sowerby Bridge). Schools: whilst the schools may be able to cope with an increased capacity, it would undoubtedly lead to more traffic for the school runs etc. Parking is haphazard at best, access is restricted and the air quality would be worse with so many new developments within such a confined space. Personal: as above, Greave House Field is on a steep incline. Any development would lead to an invasion of my privacy and would give me a poorer

quality of life, as the occupants within the new development will look directly down on the residents of Carr Field Drive. Any privacy would be completely ruined as a result.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609659>

## **Main Issues and Council Response**

### **Legal Compliance**

Main Issues:

1. Loss of Green Belt and use of access through a new neighbouring allocation.
2. Format of consultation was not effective.
3. The computer modelling and housing demands do not reflect the current course of the UK as they are out of date.

Council's Response:

1. This issue has been responded to under 'Soundness'.
2. 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).
3. The Government's forecasts for household growth have taken into account a reduction in migration from 2021.

### **Test of Soundness**

Main Issues:

1. Site access. Development will also affect access to the school.
2. Surface water flooding. SuDS should be mandatory on this site. Poor drainage.
3. Loss of Green Belt. Creation of ribbon development and urban sprawl.
4. Local road network, specifically road safety and congestion.
5. Disproportionate amount of development locally that is not needed.

6. Use Brownfield sites first (Old Sagar Richards land, Clog factory, Old Coach and Horses)
7. Infrastructure - Lack of/pressure on existing amenities / utilities, services and facilities in the local area, e.g. schools, shops, doctors.
8. Public right of way across the site, its loss of character. Impact on health and wellbeing.
9. Alternative sites are available in the area which should be used instead of this site. Not all alternatives have been considered.
10. Over development is impacting on the Conservation area. Impact on heritage assets. It has not been shown that these sites could be developed in a manner which would not harm the setting of heritage assets in the vicinity. Mitigation measures need to be firmly and effectively tied into any eventual site specific policies.
11. Development will lead to poorer air quality
12. Loss of privacy
13. Ecology - impact on wildlife.
14. Loss of Open space.
15. The housing requirement is no longer valid as the UK is no longer in the EU.
16. Increase in air pollution -impact on the Luddendenfoot AQMA.
17. Ineffective public consultation.
18. Concerns that the site has not been assessed by Highways England in conjunction with the adjacent Additional Housing Site.
19. Building on this land will destroy the natural boundary between Luddenden Foot and Luddenden

#### Council's Response:

1. Access constraints have been identified by the Council, and a Transport Assessment is required to accompany a planning application, which should assess impacts on the immediate area and identify road layout changes.
2. The site is within Flood Zone 1, and is not at risk from surface water flooding. However, due to the size of the site, and potential for development to result in increased surface water run off, a Flood Risk Assessment is required. Mitigation could also secure the area from flooding. Site specific considerations include provision of blue and green infrastructure to reduce infiltration rates and provide storm water storage.
3. This site is not Green Belt. It is designated Protected Land in the RCUDP.
4. The Council considers that the evidence submitted supports and justifies the content of the Local Plan. In addition, the Transport Assessment in any planning application would need to assess impact on local road network.

5. 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.
6. The allocation process requires a willing land owner and developer in order to demonstrate the deliverability of the sites and therefore whilst there are aspirations to use as much brownfield urban land as possible this may not always be demonstrably deliverable. In terms of the site assessment process, in order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area, only using the most sensitive Green Belt when all alternative sites were used.
7. The Infrastructure Delivery Plan is a compendium of projected infrastructure provision and it helps to ensure that this infrastructure is provided in a timely manner and in a coordinated and sustainable way. It sets out the infrastructure that will support the level of development that is proposed in the Calderdale Local Plan. The IDP is a living document, updated on at least a yearly basis and contains chapters on healthcare, utilities and provision of education.
8. The public right of way has been identified as a constraint. Schemes will be expected to incorporate this in their layout, or if ultimately necessary, arrange for a suitable diversion.
9. Prior work including that of the local Urban Capacity Study and National Land Use Database have helped inform knowledge about potential sites or locations for Development. The site assessment methodology has been open and subject to consultation throughout its preparation. The application of the methodology has allowed the consideration of suitable, deliverable, viable sites. The allocation process requires a willing land owner and developer in order to demonstrate the deliverability of the sites and therefore whilst there are aspirations to use as much brownfield urban land as possible this may not always be demonstrably deliverable. Sites which were below 0.25 hectares were filtered from allocation. Many other local authorities have traditionally used a site size of 0.4 hectares, however due to the important contribution of small sites historically in Calderdale it is believed a 0.25 hectare threshold is more appropriate. Planning Practice Guidance states that a range of different sized sites will be required to deliver the required scale of development. It suggests that sites should be assessed which could support 5 or more dwellings or economic development sites of 0.25 hectares. Sites below 0.25 ha are likely to come forward as windfalls where an assumption has been made as to their contribution to housing numbers. Where appropriate, sites below 0.25 hectares have been amalgamated with another site to take it above the site size threshold. These smaller sites also have the opportunity to be allocated as part of Neighbourhood Plans.
10. The site is within the Luddenden Conservation Area, and in close proximity to Grade II Listed Greave House and Barn. A Heritage Impact Assessment has been undertaken to assess potential impacts on these heritage assets. The Council's Conservation (Heritage) Officer has concluded that impact on Greave House and Barn would be limited due to the existing housing to the west and northeast of the site, and development would be read as a continuation of the existing housing line in views southeast from the buildings. Regarding impact on the Conservation Area, development would change the character of the site but impact is limited due to modern nature of the adjacent housing within the conservation area and the limited contribution this site makes to its setting. Mitigation measures as outlined in the Heritage Impact Assessment would minimise harm. The Council has prepared a Statement of Common Ground with Historic England, and has agreed amended wording for the Site Specific Considerations for sites included in the Publication Draft Local Plan. This wording will be amended for all additional sites in this consultation.
11. The impact of road traffic emissions on the residential development itself would not be expected to be significant, and no breach of the air quality objectives for nitrogen dioxide and particulate matter is



expected on site.

12. Policy BT2 - Privacy, Daylighting and Amenity Space of the Built Environment Chapter ensures that development proposals do not result in a significant adverse impact on the privacy, daylighting and private amenity space of adjacent residents or other occupants and provide adequate privacy, daylighting and private amenity space for existing and prospective residents and other occupants.

13. The Council's Conservation (Ecology) Section consider development of the site is acceptable subject to mitigation measures. Policies within the Green Infrastructure and Natural Environment chapter of the Local Plan, specifically Policy GN3, set out a clear and positive strategy to ensure the Council effectively manages its natural environment. Additionally, BT3 - Landscaping, ensures that new development integrates appropriately into its surroundings, contributes to the character of the area, and enhances local biodiversity.

14. Most of the site is currently designated as Protected Land but also performs the function of a natural/semi-natural open space. An assessment of open space in the area shows that there are sufficient alternative natural/semi-natural areas within the catchment of this site to meet the adopted standards. The site also includes a small area of amenity open space which if included should be replaced within the development. The visual impact of any development should be considered and the bridleway safeguarded.

15. The Planning Practice Guidance states that the 2014-based household projections should be used as the starting point for determining the level of housing provision. It also states that the 2016-based household projection should not be used. Where a recently produced Strategic Housing Market Assessment provides a figure greater than the standard method this is to be taken into account. Following the stage 1 hearings the Inspector expressed concerns around the housing figure in the Publication version of the Local Plan and requested the Council consider undertaking further work to assess the implications of housing need and requirement figures which align more closely with the Plan's economic strategy. Table 1 represents the outcome of this work. The implications of leaving the European Union are, as yet, unknown in relation to any impact on future housing requirements. The Government is clear that the current NPPF/PPG must be followed and also that Local Plans should be in place as soon as practicable.

16. Air quality has been identified by the Council's Environmental Health Team, however, it is considered that mitigation would be appropriate to address impacts. Air quality and the impact of additional road traffic taken cumulatively with other local developments would need to be considered. The impact of road traffic emissions on the residential development itself would not be expected to be significant, and no breach of the air quality objectives for nitrogen dioxide and particulate matter is expected on site. In addition, 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.

17. This issue has been responded to under 'Legal Compliance'.

18. 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. It sets out that Highways England did not assess small sites as it not considered they will contribute to any significant impact on the strategic road network.

19. Luddenden and Luddenden Foot are contiguous.

## **Duty to Co-operate**

#### Main Issues:

1. The timescale for the consultation does not demonstrate a "duty to cooperate".

#### Council's Response:

1. Extensive and inclusive consultation has been carried out throughout all stages of the Local Plan preparation process in accordance with the Council's adopted Statement of Community Involvement and is detailed in the Consultation Statement (Regulation 22).

See Submission Document SD 13 Duty to Cooperate

#### Suggested Modifications

1. SuDS should be mandatory on this site.
2. Delete the site from the Local Plan.
3. Amend Site Specific Consideration to ensure no harm to setting of heritage assets in the vicinity.

#### Council's Response:

1. No change required - While Policy SD2 makes no specific reference to SuDS, the policy requires that all new development makes a positive contribution to sustainable development by addressing climate change through mitigation and adaption. Specific requirements are detailed in policies contained in the Addressing Climate Change chapter.
2. No change required - The allocation of the site is required to meet the Council's housing need. The allocation is considered to be consistent with the Council's site allocation methodology and positioning in the trajectory as set out in the Housing Technical Paper.
3. Agreed. The Council has prepared a Statement of Common Ground with Historic England, and has agreed amended wording for the Site Specific Considerations for sites included in the Publication Draft Local Plan. This wording will be amended for all additional sites in this consultation.

## Representations

Comment ID **HRU1001**

Site ref (if applicable): **LP1372**

Person ID: **1243833** Name: **Mrs Elizabeth Arrandale** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

I do not have sufficient knowledge to comment.

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

Sound Reason:

Conservation area: Luddenden sits within a conservation area and such a development will lead to there being no boundary between Luddenden and Luddendenfoot. This land leads onto moorland and such a development will ruin the visual aesthetics of this local area. There has been much development in recent years within this area and the pressure to build yet more residential units at the expense of ruining the area completely is completely out of kilter and is unnecessary when you consider the availability of the many existing brown field sites that could be better considered. Open spaces are a necessity for quality of life and not something that is merely optional. Flooding: Removing the top soil and vegetation for housing will inevitably lead to a greater risk of flooding, potentially affecting the existing housing stock lower down. Climate change will only exacerbate this risk. The valley has already greatly suffered from flooding and we should not make matters worse when brown field sites are already available. Air quality: a development with up to 47 new residential units will mean additional vehicles - probably 70+ as a conservative estimate which will lead to a poorer air quality affecting young children and the elderly in particular. Roads: The valley roads are not built for yet more development. Traffic is already saturating the valley bottom (A646) and access to Luddenden, Midgley etc is very difficult, such has been the increase in traffic in recent years. Access would then be via Kershaw Drive and on to Kershaw Crescent. Such an increase in traffic would be dangerous for the elderly residents who live in sheltered housing on the estate and to the children, many of whom attend the local primary school. The existing bus route will be adversely affected with an increased traffic flow and in my view, the existing road infrastructure is unsuited to yet more vehicles. Infrastructure: There is little infrastructure to support existing residents, never mind new residents. Bus services have been cut to the bone, the health centre on Kershaw Drive has restricted opening hours and there is one shop serving the existing community. There are no other shops within 3 miles (Mytholmroyd or Sowerby Bridge). Schools: whilst the schools may be able to cope with an increased capacity, it would undoubtedly lead to more traffic for the school runs etc. Parking is haphazard at best, access is restricted and the air quality would be worse with so many new developments within such a confined space.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1014**

Site ref (if applicable): **LP1372**

Person ID: **951068**

Name: **Mr Steven Broadbent**

Organisation:

Agent ID:

Name:

Organisation:

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 still cannot see how and why the planning department would think this particular piece of land to be suitable for housing. The land is on a steep gradient, and has no direct utilities. Indeed it was filtered out by the planning department themselves in the Local Draft Plan 2017, and I quote; " Due to the site performing poorly against a range of different factors the recommendation is that the site be filtered from being allocated within the Local Plan." Therefore why has it been put back into the plan? My comments would be: Flooding The field has heavy clay soil, and it is on a steep slope, so water can make its own channels and cause flooding. It can be boggy at the best of times. Highways The site can only be accessed from the top end of Kershaw, currently a field gate. A development would create more traffic through the Kershaw estate, which already has issues with parking (and congestion at school drop-off and pick-up times). Ecology It is Green Belt. Open Space See above comments on ecology. Historic Environment It was filtered out originally due in part to the harming of Grade II-listed heritage assets nearby, namely Greave House and the adjacent barn. Other Factors Concerns over accessibility for school and doctor's places if the development goes ahead. Brownfield sites should be utilised before attempting to use this piece of greenfield land with such bad access. Accessibility See comments on highways. Green Belt This field is currently classed as Green Belt. Deliverability See comments on highways. These observations, along with comments by others, caused this site to be filtered out in the 2018 draft of the Local Plan. Even with so called "mitigation", why have they been put back in as the issues surrounding the use of this land for development remain the same? Wouldn't it make more sense to re-develop brownfield sites? In the locality of this area, the site of the Coach & Horses and Springfield Mill, both in Luddendenfoot, could create housing, and there are other examples of more suitable brownfield land in Calderdale (e.g. an ex-car lot on Queens Road, Halifax) available for re-development on an already existing road, transport and utilities network and without the need for spending hundreds of thousands of tax payers money on excavating and creating a needless development in this field.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1039**

Site ref (if applicable): **LP1372**

Person ID: **1122804**

Name: **Mr Gareth Vickers**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I'm sure that this potential plan is legally compliant. However I do feel that the council has not been at all open about the new plan. No postal notifications have been sent out to residents who maybe affected by this and any other plan. The council has been to reliant on the use of social media which not everyone chooses to use and other than a few small adverts in bus shelters and in the local paper. The information that is available is hard to navigate and appear to be only available online. Not everyone has access to this so many people will not have the chance to voice there objections or support for this plans. The computer Modelling and housing demands that have been set out do not reflect the current coarse that the UK is on. Now we are leaving the EU and the government has made its immigration plans public the potential calculation that are currently being used are out dated. The expected workforce growth is dependent on a very ambitious development plan in Leeds and not local growth. This is a modeled growth plan with no real hard evidence and could leave Calderdale with a property glut if the plan fails to draw in the expected growth. The council should be seen to take this into account and consider keeping with their original plan.

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

Sound Reason:

This site is Green Belt and should be kept as such. There has been fare to much green belt lost to this plan which is a tragic shame. When this site was consider last time it was filtered due to the proximity of the grade 2 listed building. The council stated "Due to the site performing poorly against a range of different factors the recommendation is that the site be filtered from being allocated within the Local Plan". (pdf attached) The site had a Heritage Impact Assessment carried out which stated - "Greave House and the adjacent barn, at the north-eastern corner of this site, are Grade II Listed Buildings. The site could also affect the setting of Luddenden Conservation Area the edge of which lies 110 metres to the north of this area. The Council has a statutory duty under the provisions of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay - "special attention" to - "the desirability of preserving or enhancing the character or appearance" of its Conservation Areas". (pdf attach) The other thing that the council should take into consideration, is that the average Yorkshire household has 1.2 cars this would mean that if an extra 62 house where built an extra 74.4 cars would be using the area. The annual carbon dioxide created by each car is on average produces 4.6 metric tons per year. That would mean that an extra 340 metric tons of carbon dioxide would be released. All of the new household that many be built here would be reliant on a car for shopping and commuting. The proposed increase is partly reflecting the planned Leeds business development plan and other no local plans. If there is a need to travel to any of the new business development people will either drive to train station or directly to work. The council declared a Climate emergency at the beginning of 2019 and are planing to reduce carbon emission by 2050. There is also the road safety issue with the increased traffic trough the Kershaw estate. The increase of traffic both during the construction and there after will put both residents and pupils at risk. The issue of the flood risk and water runoff should be of prime importance to the council and preserving any and all natural water storage should been seen as a priority. The recent flooding that has occurred in the valley is caused by over

development of the the valley, with little improvement to the the infrastructure that serves to carry away the storm water. The field in its current state hold far more water than a SUDS system could. So the water retention of the site will be reduced dramatically after the topsoil and subsoil have been removed to develop it. SUDS would help to mitigate a percentage of this lose but not the full amount and the excess will be diverted to the rivers which will increase the levels and risk of flooding in the lower valley. The field also serves as a habitat for wildlife of which many species can be found using it, Mammals, insect, birds all find a home here. It would be a travesty if our need for expansion is given president of that of our fragile natural environment. Its also enjoyed by walkers and give Luddendenfoot a soft edge that everyone currently enjoys. By removing this the current resident and pupil will loose this natural resource. The council should be looking to use existing brown field sites and making any owner of builds that are currently not in use to make them available to be developed. The old pud on Brearley has stood abandoned by its owners for years and this is true across the whole of Calderdale. The council should be forcing these to be put back into service, not just making them pay 100% council tax. There should be a emphasis on using areas that have previously been used. A note on mitigation. Although thing can be mitigated it should be asked whether it is right too. We have mitigated many things over the years and some have worked and others have not. Some of the bad mitigation we are now paying for and so is our environment. So if the council continues with this housing plan can they guaranty the mitigation is worth it.

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

Duty to Co-operate Reason:

Suggested Modifications:

The council should be looking to use existing brown field sites and making any owner of builds that are currently not in use to make them available to be developed. The old pud on Brearley has stood abandoned by its owners for years and this is true across the whole of Calderdale. The council should be forcing these to be put back into service, not just making them pay 100% council tax. There should be a emphasis on using areas that have previously been used.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609684> ; <http://calderdale-consult.objective.co.uk/file/5609682>

Comment ID **HRU1055**

Site ref (if applicable): **LP1372**

Person ID: **1122768**

Name: **Dr Sarah Vickers**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

I don't have enough legal knowledgeto know whether the plan is legally compliant but I do think that the Council has been very remiss at contacting the members of the community that would be directly affected by the additional housing allocations being put forward. This in its own right may make the plan not legally compliant. Not everyone has access to the internet or the technical ability to work through the council's consultation portal to make comments. Those directly affected by any proposed additional housing sites

should have been contacted by post as they were when the original draft of the local plan was put forward in 2017. This has not occurred this time and many of my neighbours have been unable to comment. The figures generated for the increase in housing requirement in the Calder Valley during the duration of the local plan are outdated. Brexit has occurred, there is likely to be less in migration into the area because of this. Job development in Leeds should be supported by houses close to Leeds to encourage sustainable and environmentally friendly living. Transport by foot, bike or public transport should be encouraged, not commuting by car from Luddendenfoot.

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

Sound Reason:

I would like to make the points set out below to reject use of this site in the local plan. Site LP1372 is Greenbelt and although I understand that its status can be changed it is my understanding that we should be preserving this land and looking at other options first. Greenbelt is there for green space, wildlife and to protect against urban sprawl. The beauty of the Calder valley is its green space, we shouldn't be expanding housing into it. If site LP1372 were to be used for housing there would be significantly more traffic past a primary school and very close to a special needs school. There would be a significant increase to local traffic on roads that are not designed for this volume of traffic and increased commuting times. There is no rail link at Luddendenfoot. Any additional housing will bring more cars and traffic into the area. There is no significant employment in the immediate area. People would need to commute to work. Luddenden lane is narrow in places due to parked cars. Burnley road is the only access along the valley floor. It is already very busy at peak times and commuting times can be long and slow. Additional traffic would be detrimental to people already living and working in the valley. The Luddenden lane/ Burnley road junction already gets congested at peak times. It is already very difficult to get access to a doctor at the local practice, there are already long wait times for an appointment. Further houses and residents in this area will only add to this problem. There isn't the infrastructure in transport or services, or the plans for it to be constructed, to support the increased volume of housing and people in this part of Luddendenfoot. If this site was developed there would be increased run off and further risk of flooding in the Kershaw estate and Luddendenfoot. Some of the properties in these areas have already been flooded during the local storms. We need all the natural resources we can at present to protect the Calder Valley from further flooding. The site would be better used as a green area for the local community and trees planted to help control the water run off. The Local plan states that some of the increases requirement for housing is because of proposed building/ job development in Leeds. The Calderdale council has declared a climate emergency, building houses in an area that requires a commute by car and in a flood risk area and on greenbelt land doesn't make sense.

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

Duty to Co-operate Reason:

Suggested Modifications:

The council should look at other brownfield sites prior to considering this site. There are also sites from old pubs and mill buildings that have been derelict for a while and should be considered for redevelopment before encroaching on the natural environment. Multiple smaller sites (brownfield or buildings needing renovation) should be considered first. This would allow land already designated for building or land that has already been altered to be used. These small pockets of development would also stop congestion and the large influx of population, traffic and pollution within a small area as they would be spread out throughout Calderdale. We are living in a time of climate emergency, we should not be building on our natural resources. Greenfield or greenbelt. We should be reducing pollution, reducing damage to our natural environment and introducing natural defenses to issues such as flooding.

Comments:

Additional Evidence Link:

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Comment ID **HRU1269**

Site ref (if applicable):

Person ID: **954051**

Name: **Miss Elaine Walker**

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:

Given the current issues with flooding in the valley it is time to call a moratorium on new developments in this area. The combination of the flood defence works in Mytholmroyd and new developments will exponentially increase the risk of flooding to homes and businesses in the Luddenden/Luddendenfoot area and further downstream. In addition to this risk, it is clear that the current resources for schools and healthcare provision in the area are inadequate to meet the demands of the current population and the road and sewerage systems are already at capacity. Besides the threat of flooding and lack infrastructure, these potential sites are in the Greenbelt. If it is agreed to add these sites to the Local Plan it leaves the door open for further developments on greenbelt sites across Calderdale and countryside, harming the environment, reducing air quality, and damaging fragile ecosystems and wildlife.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1289**

Site ref (if applicable): **LP1372**

Person ID: **1243927**

Name: **Mrs Helen Tempest**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

see comments below



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

Sound Reason:

Housing Growth The Local Plan was drawn up between 2016 and 2018, with amendments made in October 2019. We have now left the EU. The housing projection used in the Local Plan is no longer valid. Reduced immigration will lead to a reduction in the amount of new housing required and therefore reduce the need to release Green Belt and greenfield sites. Negative impact on the Green Belt The NPPF Chapter 13 states -“ The Government attaches great importance to Green Belts “2-“ local planning authorities should ensure that substantial weight is given to any harm to the green belt”2“Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified”2 “Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances”. -“ a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt “2-“ 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. ”2 Building on this and the adjacent site LP0931 is contradictory to all of these statements. I do not see any exceptional circumstances evidenced or justified in these proposals to allow building on this Greenbelt land. There are many other sites within the Calderdale catchment that do not sit within Greenbelt Land that could be considered for development before ruining forever the Greenbelt Land in this site. Some sites have been removed from the plan simply because developers do not want to develop these sites as profits are not as high or as a developer is not currently available. This is not a good reason for destroying highly sensitive green belt and does not constitute exceptional circumstances. I consider the proposal is contrary to NPPF 134 -“Green Belt serves 5 purposes: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land”2Calderdale Council, in its own words in their filtered site assessment, concluded -“this area of Green Belt performed well against these five Green Belt purposes”2 The proposed development of nearly 100 new homes (together with adjoining site LP0931) will lead to urban sprawl, linking the villages of Luddenden Foot and the conservation village of Luddenden. It will destroy the setting and special character of the consideration village of Luddenden. It also encroaches on important green space, removes natural habitat and takes away an integral part of the wildlife corridor (against NPPF 174). The function of the Calderdale Council Planning Department is to facilitate sustainable development that make a positive contribution to the local environment. It is NOT the role of the Council to make unacceptable sites within the Green Belt available, to meet their housing targets. Why have the council not carried out and published a detailed Green Belt Review survey for this site, such as that attached to LP0196 in the draft plan? Other potential sites within the valley include -the former Coach and Horses, -The former Grove Inn at Brearley, -The former White Lion in Mytholmroyd, -Walkleys Mill at Mayroyd, -the former Woodman at Charlestown If the owners are not taking positive steps to bring the site into residential development then the action the Council is taking under its powers within Calderdale Council's Empty Homes strategy 2014 ; 2020 should be more visible.

Flooding The current policy and legislation on flooding states -“ due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere. Chapter 14, paragraph 163 of the NPPF states: -“ When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere”2The continued flooding issues experienced in the upper Calder Valley is well documented. The proposed development will increase run-off water into the River Calder at Luddenden Foot, which flooded in early 2020, with a further flood warning 2 weeks later. This land soaks up a vast quantity of rainwater and there are natural springs that pop up all over the hillside. Disrupting these natural springs will cause the water to simply be diverted elsewhere, causing certain flooding further

down. I urge the decision makers to think logically and show some common sense in realising that you cannot keep taking away the natural flood plains without it causing devastating consequences. Para 158 NPPF states ' Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding '. I do not see any evidence that the authority has exhausted other options of seeking development sites in lower risk flooding areas or sites that will not cause further flooding elsewhere. Loss Wildlife Corridor This site with the adjoining site LP0931 is a wildlife habitat for many, many different species including deer foxes and bats. NPPF Chapter 15 states that planning policies and decisions should contribute to and enhance the natural and local environment by : protecting and enhancing valued landscapes and sites of biodiversity. It also states - to protect and enhance biodiversity and geodiversity, plans should: identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including wildlife corridors. Developing these sites will put this precious wildlife corridor and all its inhabitants at great risk directly opposing the NPPF legislation and the DEFRA 25 Year Plan. Para 177 NPPF states that ' The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site'. Building on the land included in this and the adjoining site LP0931 will be extremely detrimental to the wild animals within the area. No mitigation can prevent the impact of urban sprawl and the destruction of natural habitats. Air Pollution and Traffic Congestion The development of this site will undoubtedly impact the Luddenden Foot AQMA that already exists and the other 6 AQMAs detailed in the local plan at 21.11, as residents travel to work both within the local area, plus all access roads to the motorway go through further AQMAs. Highways In one of the filtered sites at Mytholmroyd LP1519, which was to provide c.100 residential its, Highways England stated that development of the site - "should not be commenced until completion of the Route Improvement Schemes programmed to start in the current roads period (2015/16-2019/20)". Yet the total number of new homes in this and the adjacent site LP0931 is a similar number. How does any development in the valley therefore make sense until completion of the Route Improvement Scheme, when considering the cumulative effect rather than at individual site level? Consultation LP1372 was a rejected (filtered) site in the draft 2017 local plan, which meant many residents would not have felt the need to comment. In the original site assessment, the council stated -" The site falls within a Special Landscape Area where development could harm the landscape and the site performs well against the Green Belt Purposes. Due to the site performing poorly against a range of different factors the recommendation is that the site be filtered from being allocated within the Local Plan " The Council have now gone against their own original recommendations. This site has been included in the revised plan at the last minute, with little consultation or advertisement (no public meetings etc.). When considering that the council themselves own this site and will therefore derive income from its sale, and that it seems to have been included with the sole purpose of resolving access issues related to adjacent site LP0931, is nothing short of disgraceful. Calderdale Council has not been helpful or open about this new consultation period and have failed to make the residents aware of the need to submit new objections to the amended Local Plan and the timescales for this. The Council probably hoped that the amended local plan (with the additional sites included) would slip through unnoticed and unchallenged. I do not consider that Calderdale Council have acted in a fair, open, honest and transparent way in regard to the amendments made to the Local Plan

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

Duty to Co-operate Reason:

see comments above

Suggested Modifications:

Remove this site from the local plan

Comments:

Additional Evidence Link:

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Comment ID **HRU1320**

Site ref (if applicable): **lp1372**

Person ID: **1243875**

Name: **Mrs Marsden Marsden**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

A development of this size would certainly generate a substantial increase in traffic, up to eighty extra cars. They would have to use Kershaw Drive and Luddenden Lane as this is the only way out of Luddenden. Luddenden Lane gets very congested at rush hour with cars trying to access the A646. or trying to turn up Luddenden Lane. Kershaw Estate is a busy place and has an infants/Junior school, a special needs school, a shop and a clinic all very close to Luddenden Lane. The extra number of cars, besides causing inconvenience to residents would put children at risk. We feel strongly that land should not be taken out of greenbelt, which is meant to protect the countryside from urban sprawl. First it would lead to the loss of an important amenity area, and second it could well prove to be "the thin end of the wedge" with more greenbelt being lost over time. More should be done to make use of brownfield sites, such as the old Sagar Richards factory or the site of Walkleys clogs, rather than building on unspoilt land.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1556**

Site ref (if applicable): **LP1372**

Person ID: **1244125**

Name: **Mr Richard Wilding**

Organisation:

Agent ID:

Name:

Organisation:

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 a number of concerns about the proposals: 1. Additional housing will be located on a sloping site, which is highly likely to contribute to further/faster water run-off which will potentially lead to increased risk/frequency of flooding. Luddenden Lane, between Greave House Fields and Kershaw Drive already floods during heavy rain as well as Burley Road at the bottom of Luddenden Lane. 2. The proposed new houses will increase the volume of traffic using Luddenden Lane, which is already a very busy road, given its size. This will have an impact on road safety and there is likely to be a much greater bottle-neck at the bottom of Luddenden Lane, both joining and leaving Burnley Road. 3. Re-using sites that are currently not in use, such as former Springfield Camping site or former Coach & Horses pub would be a better solution than building on green-field sites.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1782**

Site ref (if applicable): **LP1372**

Person ID: **959786**

Name: **Mrs Christine Goodman**

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 inclusion of this site in the plan for the following reasons. The site is currently within the Green Belt. Whilst I acknowledge that the authority has the right to change the boundaries of Green belt in this case, I feel that there has not been sufficient work done by the authority to identify alternative brown field sites which are available. This building of 47 dwellings here will create even more of a problem obtaining appointments at the nearby Health Centre. It is now almost impossible to get an appointment with either a doctor or a nurse unless it is for an extreme emergency in less than 3 to 4 weeks. The development will almost certainly place a minimum of an extra 70 vehicles on the surrounding roads which already are taking vastly in excess of what they are designed for. It is now commonplace for queues of tens of vehicles to be waiting at the bottom of Luddenden Lane to try to gain access to the A646. Similarly, the extra traffic passing a junior school and a special school will be an extra hazard for children to negotiate as they cross the road there.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1806**

Site ref (if applicable):

Person ID: **959186**

Name: **Mr. Rodney Collinge**

Organisation: **Luddenden Conservation Society**

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:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5619050>

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Comment ID **HRU2254**

Site ref (if applicable):

Person ID: **1246937**

Name: **Emma Sharpe**

Organisation: **Inspector of Historic Buildings and Areas**

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 FOR FULL REPRESENTATION Several of the proposed additional site allocations would have

an impact on the historic environment. This impact has been assessed by your authority in the Local Plan: Heritage Impact Assessments document (Local Plan Document EV28). The Heritage Impact Assessments recommended amendments to the size of the developable area for some site allocations and the majority of these have been reflected in the specific site records in Appendix 1 of the Housing Requirement Update and Potential Supply. The exception is Site LP1372 and we recommend the indicative developable area shown on the site allocation (Appendix 1, page 30) is amended to reflect the conclusions of the Heritage Impact Assessment.

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

Duty to Co-operate Reason:

Suggested Modifications:

we recommend the indicative developable area shown on the site allocation (Appendix 1, page 30) is amended to reflect the conclusions of the Heritage Impact Assessment.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5635295>

Comment ID **HRU2263** Site ref (if applicable):

Person ID: **1246937** Name: **Emma Sharpe** Organisation: **Inspector of Historic Buildings and Areas**

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 FOR FULL REPRESENTATION The site specific considerations for several of the proposed allocations refer to -“consideration of recommendations in the Heritage Impact Assessment”In order for the development of these allocations to be compatible with not only national policy guidance but also the Plan's policies for the conservation of the historic environment, these mitigation measures need to be implemented as part of any development proposals. Consequently, mitigation measures need to be firmly and effectively tied into any eventual site specific policies. Unfortunately, as worded, the policy suggests that development need only 'consider' the recommendations, with no requirement for the design of a scheme to put into effect the proposed mitigation measures. We therefore consider it has not been shown that these sites could be developed in a manner which would not harm the setting of heritage assets in the vicinity. This is an issue we raised at Publication Draft stage (our letter of 18 September 2018). We are currently working on a Statement of Common Ground with your authority, aiming to agree wording to effectively tie the recommendations of the Heritage Impact Assessments to the relevant Local Plan policies. If it is proposed to proceed with the additional site allocations we recommend this would also apply to those sites.

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

Duty to Co-operate Reason:

Suggested Modifications:

Amend Site Specific Consideration to ensure no harm to setting of heirtage assets in the vicinity.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5635295>

Comment ID **HRU650**

Site ref (if applicable): **LP1372**

Person ID: **1242636**

Name: **Mrs Diana Ellis**

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 make comments on the proposed Mytholmroyd additional housing sites for the draft local plan. We have lived in Carr Field Drive for over 20 years and brought up three children here who all attended the local village school. I am concerned about the proposed development because : 1)The area is a much - loved and used part of the Green Belt; walkers, runners and dog walkers use the fields many times every day; it is a green lung for the village and indeed for many other local walking groups who park in the village car park and enjoy the countryside. 2) The increase in traffic around the primary school would be a danger to schoolchildren and other members of the community. It would also cause even more of a bottleneck at the bottom of Luddenden Lane where it meets the Burnley Road causing further delays for village residents and for other users of the Burnley Road. 3) Additional housing will add to the rain run off from the hillside and cause flooding. This has already been a serious problem for a number of people in our road and I'm concerned it will lead to more flooding both for Carr Field and residents of Dene View in particular. 4) The proposed development is far too dense for the area and I do not accept there is this level of demand in the area eg the site of the former Coach & Horses at the bottom of Luddenden Lane/ Burnley Road has remained undeveloped for many years. I should be grateful if you could take these points into consideration.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU67**

Site ref (if applicable): **LP1372**

Person ID: **1126233**

Name: **Mr Scott Patient**

Organisation:

Agent 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:

Both sites within the Luddendedfoot ward have access and potential surface water/flooding issues. I trust these will both be adequately dealt with first. SUDS should be mandatory and throughout on both schemes should they ever progress.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Both sites within the Luddendedfoot ward have access and potential surface water/flooding issues. I trust these will both be adequately dealt with first. SUDS should be mandatory and throughout on both schemes should they ever progress.

Comments:

Additional Evidence Link:

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Comment ID **HRU798**

Site ref (if applicable):

Person ID: **957530**

Name: **Mr. Rodney Collinge**

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 number LP1372 at Kershaw Drive, Luddendenfoot I wish to object to the inclusion of this site in the plan for the following reasons. The site is currently within the Green Belt. Whilst we acknowledge that the authority has the right to change the boundaries of Green belt in this case, we feel that there has not been sufficient work done by the authority to identify alternative brown field sites which are available. We shall



make alternative suggestions following this, but we hope that taking land out of Green belt will only be carried out where it is strictly necessary. We feel that this is not the case here. This building of 47 dwellings here will create even more of a problem obtaining appointments at the nearby Health Centre. It is now almost impossible to get an appointment with either a doctor or a nurse unless it is for an extreme emergency in less than 3 to 4 weeks. The development will almost certainly place a minimum of an extra 70 vehicles on the surrounding roads which already are taking vastly in excess of what they are designed for. It is now commonplace for queues of tens of vehicles to be waiting at the bottom of Luddenden Lane to try to gain access to the A646. Similarly, the extra traffic passing a junior school and a special school will be an extra hazard for children to negotiate as they cross the road there. Possible extra sites for housing. I note that no figure has been given for the number of extra dwellings required in each area. However, as the above two sites are the only ones mentioned for the Mytholmroyd area, we are assuming that in the region of 80 to 90 new dwellings are the total requirement. We would suggest that this figure could be met without either of these two sites being needed by using the following land. One site mentioned as a possibility for industrial and housing site is at Top Land, Mytholmroyd. One would assume that the industrial development would be in the area which appears to be covered by huts. At a 'guess', that leaves in the region of 5 hectares of land which could be developed for housing. Recently, the ex-Springfield Camping mill outlet in Luddendenfoot has closed down, with a possibility of that being converted into apartments, maybe 6. The demolition of the mill at the ex-Walkley's Clog factory at Hawksclough has left a site which could be developed for housing, with suitable precautions taken for flood risk. In fact, we don't think flooding has taken place there even though it is next to the river. This would take 8 dwellings. The site of the old Sagar Richards industrial complex at Luddendenfoot has not been fully explored for housing development. This could also take place between the entrance road to Tenterfields and the existing dwellings opposite the school. Use of such sites as these would totally obviate the use of land at Greave House Fields and Kershaw, which I am sure can only be described as first class amenity land, particularly compared to alternatives. We would strongly urge the exploration of alternatives than going to the easy targets of prime undeveloped green land.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU826**

Site ref (if applicable): **LP1372**

Person ID: **955696**

Name: **Mrs Christine Wardle**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

I am sure that lawyers would confirm that legal requirements are met but I would argue that morally there is a lack of clarity and simplicity to this objection procedure which deters laymen from objecting. Most residents affected by changes to the plan are unaware and many struggle with the online platform which is

not user friendly and uses unfamiliar terminology. I am questioning the legality on the following points: 1. National planning policy states that Green Belt must not be built on except in 'exceptional circumstances' and all other options have been examined. I believe that this is not the case in this instance. 2. Brownfield sites have not been examined properly for developing into housing stock which would support Calderdale's own planning policy and Central Government aims. I believe this has not happen since no evidence of this has been put forward and it would appear this is because brownfield sites are more expensive to develop and some are designated as commercial not residential when this designation could be changed if there was a will. Calderdale council are keener to take their lead from land owners and big developers who will benefit financially and then move on. They have no personal investment in the area and put limits on the size of plots they are willing to develop - hence no small previously used sites just large empty fields of green with maximum financial return. 3. Calderdale council was granted £50,000 by Esther McVey 2016 to protect loss of Green Belt. Surely planning to build on it 4 years later is morally if not legally wrong? 4. The proposed changes to housing requirements have been based on predictions for economic growth based on 2016 pre Brexit figures. Where exactly are the residents on any new houses in Luddenden going to work? If anything business in the Calder Valley will relocate due to repeated flooding. Is there any evidence on the ground of any substantial economic growth since those 2016 figures.?

Do you consider the plan to be Sound?: **No**

Sound Reason:

If any reason needs to be found to stop the building on Green Belt and virgin land in the Calder valley then look no further than the events of February 9th when floods devastated the lives of business people and residents in the valley again. When Teresa Villiers visited Mytholmroyd to see for the government what had gone on she said on national TV ' This area has a unique geography" Calderdale Council need to be brave enough and say that targets for house building on green land in this area cannot and will not be met on order to protect the area for the future. Our green valley sides are sponges for rainfall and building on them will only add to the misery of residents lower down the slopes who pick up the run off. Even now gardens in Carr Field Drive below the proposed development of Greave House Fields were flooded . Heaven knows what it would have been like if those fields were tarmac and concrete. There is also evidence of slumping to the land above Carrfield. A huge amount of investment and expertise is needed to restore the upper moorlands and valley tops before any development should take place to meet a short term building target. Calderdale Council need to be planning for a sustainable future for current home owners and recognise the 'the intrinsic character of the countryside' when they are reconsidering sites. If the planned houses are built on Kershaw and Greave house fields the number of cars using local roads will add to an existing problem. There are 2 primary schools to navigate past, Luddenden Lane with little or no pavement at the bottom and Burnley Road, thus adding to the congestion, poor air quality and stress. The current green space allows a break between historic Luddenden Village and Luddenden Foot providing a wild life corridor and breathing space for residents contributing to exercise, fresh air and improved mental health. Once deer , foxes, birds and humans lose that space it is gone forever.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

No one wants to see Green Belt and Green Fields go forever except those one or two individuals who will make money from it.

Suggested Modifications:

The following needs to happen before any more houses should be built on green land. 1. Upper moorland management changes to restore and improve flood control. This will involve working with land owners, the

shooting and sporting bodies who use the land and the environment agency. A 20 year plan at least. 2. Testing of the yet unfinished Calder valley flood defences. Time scale undetermined 1-100 years 3. Drastic improvement to Burnley Road. The recent council traffic management plans did not really address this issue because basically there is no cheap fix to too many cars using a road that is parked on, constantly being dug up and not able to cope with demand. 4. Public transport investment. Try getting to Manchester or Leeds for work ,if you live in Luddenden, without using a car. Good Luck. These house building targets are set by people who live in London and have no idea. I urge Calderdale council to recognise the unique geographic quality of the Calder Valley and be brave enough to say NO to targets set by officials in London. Say that we will think creatively and look to provide more homes on land that suits our unique situation and time frame and not to grasp at the cheapest and easiest option which will be to the long term detriment of our area.

Comments:

Additional Evidence Link:

Comment ID **HRU961**

Site ref (if applicable): **LP1372**

Person ID: **1238595**

Name: **MR Michael Wardle**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

I object to the inclusion of this site in the development plan because it is in "Green Belt" I understood that the "Green Belt "is protected against development. The site was not in the original draft plan but is included now because the council are being forced to increase the target house building quota without the necessary time to full investigate alternative sites. The sites LP0931 and LP1372 should be considered together because of the overall impact they will have on the local area. 93 house with 93 cars. The process to object is very complicated and difficult to understand. The website is difficult to use with any confidence.

Do you consider the plan to be Sound?: **No**

Sound Reason:

I object to the development of the site because it is not sustainable socially or environmentally. Local infrastructure is at capacity and there is no planned improvement to support developments of this size. The development of the site will increase the use of private car use. There is the potential for 47 (93 if added to LP0931) more cars plus increases due to modern shopping habits. The site is uphill and further away from shops, bus stops and railway stations. Access is via Kershaw Drive, Luddenden Lane onto Burnley Rd. These roads are steep with poor junctions and much on road parking. Disabled and push chair access is difficult and can be dangerous because of steep hills, narrow pavements and cars parked on pavements. There is no provision for cyclists. Increased traffic will increase the pollution around the local schools where traffic calming slows traffic flow causing pollution from standing traffic. Local medical care access has become very difficult. Appointments can only be booked 3 to 4 weeks in advance and are a car journey away in Mytholmroyd. There is no direct bus route. This site climbs the hill side above the Kershaw estate. It is locally the first site of this scale to be developed above the contour boundary of the Kershaw estate and as such changes the character of local environment. It will act as an obstacle to wild life that

contours around the valley side. The impact of this extension to the Kershaw estate to the local wild life will be considerable. Building on these fields will increase the run off of rain water in to the present drainage system which has demonstrated recently that it cannot cope. The ability of these fields to absorb rainfall will be lost and replaced by a system that may work but will need maintaining a problem that the council is at present struggling with. The footpath from the Kershaw estate will loose its open character.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

The time scale set out for all parties to investigate and fully consider the implications of these new proposals does not in my view demonstrate a "duty to co-operate". They are being rushed through.

Suggested Modifications:

This site adjacent to this has already been considered and refused. The reasons for the refusal have not changed. The development of this site makes the problems bigger because 93 house are being built instead of 44. The development of the site should be refused. Alternative brown field sites should be used such as Springfield Camping, Sagar Richards and the old Clog Factory. There are many others in Calderdale. There has already been much "Wind Fall" development locally the impact of which needs to be investigated and considered along side these developments.

Comments:

Additional Evidence Link:

Comment ID **HRU999**

Site ref (if applicable): **LP1372**

Person ID: **952011**

Name: **RT Arrandale**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

I do not have sufficient knowledge to comment.

Do you consider the plan to be Sound?: **No**

Sound Reason:

I wish to object to the proposed development on the following grounds: Conservation area: Luddenden sits within a conservation area and such a development will lead to there being no boundary between Luddenden and Luddendenfoot. This land leads onto moorland and such a development will ruin the visual aesthetics of this local area. There has been much development in recent years within this area and the pressure to build yet more residential units at the expense of ruining the area completely is completely out of kilter and is unnecessary when you consider the availability of the many existing brown field sites that could be better considered. Open spaces are a necessity for quality of life and not something that is merely optional. Flooding: Removing the top soil and vegetation for housing will inevitably lead to a greater risk of flooding, potentially affecting the existing housing stock lower down. Climate change will only exacerbate this risk. The valley has already greatly suffered from flooding and we should not make matters worse

when brown field sites are already available. Air quality: a development with up to 47 new residential units will mean additional vehicles - probably 70+ as a conservative estimate which will lead to a poorer air quality affecting young children and the elderly in particular. Roads: The valley roads are not built for yet more development. Traffic is already saturating the valley bottom (A646) and access to Luddenden, Midgley etc is very difficult, such has been the increase in traffic in recent years. Access would then be via Kershaw Drive and on to Kershaw Crescent. Such an increase in traffic would be dangerous for the elderly residents who live in sheltered housing on the estate and to the children, many of whom attend the local primary school. The existing bus route will be adversely affected with an increased traffic flow and in my view, the existing road infrastructure is unsuited to yet more vehicles. Infrastructure: There is little infrastructure to support existing residents, never mind new residents. Bus services have been cut to the bone, the health centre on Kershaw Drive has restricted opening hours and there is one shop serving the existing community. There are no other shops within 3 miles (Mytholmroyd or Sowerby Bridge). Schools: whilst the schools may be able to cope with an increased capacity, it would undoubtedly lead to more traffic for the school runs etc. Parking is haphazard at best, access is restricted and the air quality would be worse with so many new developments within such a confined space.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

## **Main Issues and Council Response**

### **Legal Compliance**

Main Issues:

1. Ineffective public consultation.
2. Lack of exceptional circumstances for releasing Green Belt.
3. Lack of proper consideration of brownfield sites.
4. Housing requirements are based on economic growth pre Brexit.
5. The web-site is difficult to use.
6. Loss of Green Belt

Council's Response:

1. Extensive and inclusive consultation has been carried out throughout all stages of the Local Plan preparation process in accordance with the Council's adopted Statement of Community Involvement and is detailed in the Consultation Statement (Regulation 22).

2. This issue has been responded to under 'Soundness'.
3. The allocation process requires a willing land owner and developer in order to demonstrate the deliverability of the sites and therefore whilst there are aspirations to use as much brownfield urban land as possible this may not always be demonstrably deliverable. In terms of the site assessment process, in order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area, only using the most sensitive Green Belt when all alternative sites were used.
4. The Planning Practice Guidance states that the 2014-based household projections should be used as the starting point for determining the level of housing provision. It also states that the 2016-based household projection should not be used. Where a recently produced Strategic Housing Market Assessment provides a figure greater than the standard method this is to be taken into account. Following the stage 1 hearings the Inspector expressed concerns around the housing figure in the Publication version of the Local Plan and requested the Council consider undertaking further work to assess the implications of housing need and requirement figures which align more closely with the Plan's economic strategy. Table 1 represents the outcome of this work. The implications of leaving the European Union are, as yet, unknown in relation to any impact on future housing requirements. The Government is clear that the current NPPF/PPG must be followed and also that Local Plans should be in place as soon as practicable.
5. The website has been set up to be as user friendly as possible.
6. This issue has been responded to under 'Soundness'.

## Test of Soundness

### Main Issues:

1. Site access
2. Surface water flooding. SuDS should be mandatory on this site.
3. Loss of Green Belt. Creation of urban sprawl. Lack of exceptional circumstances. A Green Belt Review has not been undertaken for this site.
4. Local road network, specifically road safety and congestion.
5. Disproportionate amount of development locally that is not needed.
6. Use Brownfield sites first.
7. Alternative sites are available in the area which should be used instead of this site. Not all alternatives have been considered.
8. Infrastructure - Lack of/pressure on existing amenities, services and facilities in the local area, e.g. schools, shops, doctors.
9. Housing requirement cannot be met given environmental constraints of the area.
10. Loss of open space.

11. Over development is impacting on the Conservation area.
12. Development will lead to poorer air quality
13. Loss of privacy
14. Ecology - impact on wildlife.
15. The housing requirement is no longer valid as the UK is no longer in the EU.
16. Heritage - development will destroy the character and setting of the conservation area of Luddenden Village. The developable area should reflect the recommendations of the Heritage Impact Assessment. It has not been shown that these sites could be developed in a manner which would not harm the setting of heritage assets in the vicinity. Mitigation measures need to be firmly and effectively tied into any eventual site specific policies.
17. Increase in air pollution -impact on the Luddendenfoot AQMA.
18. Ineffective public consultation.
19. Concerns that the site has not been assessed by Highways England in conjunction with the adjacent Additional Housing Site.
20. The Council has failed to explore all other brown field opportunities before concluding exceptional circumstances exist to release Green Belt land.

#### Council's Response:

1. Highways Development Management has stated access could be achieved off Burnley Road via Luddenden Lane and Kershaw Drive but this would significantly increase the volume of traffic through the existing residential area. Transport Assessment and Travel Plan as well as access proposals to mitigate traffic impact would be required.
2. The site is wholly within Flood Zone 1 but it is recommended that a Flood Risk Assessment be undertaken given the size and greenfield nature of the site. The Council's Flooding and Drainage Section has noted a number of land drainage issues reported in the vicinity of the site in the past. The recommendation is that the site is suitable for development after necessary action for the surface water/drainage assessment.
3. The NPPF states that once established, the green belt should only be changed in exceptional circumstances during a development plan review.  
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. It is considered that the exceptional circumstances have been demonstrated to justify the proposed changes to the Calderdale Green Belt boundary. EV51.10 is the Green Belt Assessment of Sites, and includes an assessment of this site.
4. The Council considers that the evidence submitted supports and justifies the content of the Local Plan. In

addition, the Transport Assessment in any planning application would need to assess impact on local road network.

The policies within the Local Plan support the achievement of the Local Plan Transport Objective, 'To ensure the provision of a sustainable, safe and efficient transport system which reduces car dependency and improves quality of life through a balance of promoting economic growth, enhancing environments and improving transport access for communities'

To achieve these objectives the Council is developing a range of strategies and interventions, and the Local Plan has a role to play in supporting these, but also ensuring development proposals meet these objectives and contribute more widely to an integrated 'active mode' network.

The IDP proposes a number of key schemes which will allow development in line with the aspirations of Calderdale while reducing the impacts on the transport network. The planned growth has been targeted spatially in areas where access to alternative modes of transport (other than the private car) are best, in order to reduce reliance on cars for travel.

Detailed Information on transport infrastructure in Calderdale is provided in Chapter 13: Infrastructure and Master Planning of the Local Plan and in the WSP Technical Reports (EV54.1 – EV54.12) in the Local Plan Examination Library.

A Transport Assessment in any planning application would need to assess impact on local road network. Road Safety would be assessed as part of any submission.

5. 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.

6. The allocation process requires a willing land owner and developer in order to demonstrate the deliverability of the sites and therefore whilst there are aspirations to use as much brownfield urban land as possible this may not always be demonstrably deliverable. In terms of the site assessment process, in order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area, only using the most sensitive Green Belt when all alternative sites were used.

7. Prior work including that of the local Urban Capacity Study and National Land Use Database have helped inform knowledge about potential sites or locations for Development. The site assessment methodology has been open and subject to consultation throughout its preparation. The application of the methodology has allowed the consideration of suitable, deliverable, viable sites. The allocation process requires a willing land owner and developer in order to demonstrate the deliverability of the sites and therefore whilst there are aspirations to use as much brownfield urban land as possible this may not always be demonstrably deliverable. Sites which were below 0.25 hectares were filtered from allocation. Many other local authorities have traditionally used a site size of 0.4 hectares, however due to the important contribution of small sites historically in Calderdale it is believed a 0.25 hectare threshold is more appropriate. Planning Practice Guidance states that a range of different sized sites will be required to deliver the required scale of development. It suggests that sites should be assessed which could support 5 or more dwellings or economic development sites of 0.25 hectares. Sites below 0.25 ha are likely to come forward as windfalls where an assumption has been made as to their contribution to housing numbers. Where appropriate, sites below 0.25 hectares have been amalgamated with another site to take it above the site size threshold. These smaller sites also have the opportunity to be allocated as part of Neighbourhood Plans.

8. The Infrastructure Delivery Plan is a compendium of projected infrastructure provision and it helps to ensure that this infrastructure is provided in a timely manner and in a coordinated and sustainable way. It sets out the infrastructure that will support the level of development that is proposed in the Calderdale



Local Plan. The IDP is a living document, updated on at least a yearly basis and contains chapters on healthcare, education provision and utilities.

9. Environmental constraints of the area have been considered through thorough consultation with a range of statutory and non statutory bodies. Sites to meet the housing requirement have been identified.

10. The site is currently designated as greenbelt but also performs the function of a natural/semi-natural open space. An assessment of open space in the area shows that there are sufficient alternative natural/semi-natural areas within the 400m, 600m and 1200m catchments of this site to meet the adopted standards. The visual impact of any development should be considered.

11. The site is within the Luddenden Conservation Area, and in close proximity to Grade II Listed Greave House and Barn. A Heritage Impact Assessment has been undertaken to assess potential impacts on these heritage assets. The Council's Conservation (Heritage) Officer has concluded that impact on Greave House and Barn would be limited due to the existing housing to the west and northeast of the site, and development would be read as a continuation of the existing housing line in views southeast from the buildings. Regarding impact on the Conservation Area, development would change the character of the site but impact is limited due to modern nature of the adjacent housing within the conservation area and the limited contribution this site makes to its setting. Mitigation measures as outlined in the Heritage Impact Assessment would minimise harm.

12. The impact of road traffic emissions on the residential development itself would not be expected to be significant, and no breach of the air quality objectives for nitrogen dioxide and particulate matter is expected on site.

13. Policy BT2 - Privacy, Daylighting and Amenity Space of the Built Environment Chapter ensures that development proposals do not result in a significant adverse impact on the privacy, daylighting and private amenity space of adjacent residents or other occupants and provide adequate privacy, daylighting and private amenity space for existing and prospective residents and other occupants.

14. The site is within the Natural England consultation zone with regards to the Special Protection Area; any development proposal will need to be subject to a Habitat Regulations Assessment. There are no known habitats or species of local or national importance on the site, however, allocating this site could lead to increased pressure on the South Pennine Moors SPA/SAC. Policies within the Green Infrastructure and Natural Environment chapter of the Local Plan, specifically Policy GN3, set out a clear and positive strategy to ensure the Council effectively manages its natural environment.

15. The Planning Practice Guidance states that the 2014-based household projections should be used as the starting point for determining the level of housing provision. It also states that the 2016-based household projection should not be used. Where a recently produced Strategic Housing Market Assessment provides a figure greater than the standard method this is to be taken into account. Following the stage 1 hearings the Inspector expressed concerns around the housing figure in the Publication version of the Local Plan and requested the Council consider undertaking further work to assess the implications of housing need and requirement figures which align more closely with the Plan's economic strategy. Table 1 represents the outcome of this work. The implications of leaving the European Union are, as yet, unknown in relation to any impact on future housing requirements. The Government is clear that the current NPPF/PPG must be followed and also that Local Plans should be in place as soon as practicable.

16. A Heritage Impact Assessment has been undertaken for this site, which highlights that development would change the character of the site and impact on the wider rural setting of the conservation area.

However, it is considered that a package of measures, developed in consultation with the Council's Conservation Officer, could be applied to minimise any such harm. The Council has prepared a Statement of Common Ground with Historic England, and has agreed amended wording for the Site Specific Considerations for sites included in the Publication Draft Local Plan. This wording will be amended for all additional sites in this consultation.

17. Air quality has not been raised as an issue by the Council's Environmental Health Section. 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.

18. This issue has been responded to under 'Legal Compliance'.

19. 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. It sets out that Highways England did not assess small sites as it not considered they will contribute to any significant impact on the strategic road network.

20. 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. 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.

### **Duty to Co-operate**

#### **Main Issues:**

1. Timescale for consultation have been rushed and do not demonstrate a "duty to cooperate".

#### **Council's Response:**

1. Extensive and inclusive consultation has been carried out throughout all stages of the Local Plan preparation process in accordance with the Council's adopted Statement of Community Involvement and is detailed in the Consultation Statement (Regulation 22).  
See Submission Document SD 13 Duty to Cooperate

### **Suggested Modifications**

1. SuDS should be mandatory on this site.
2. Improve traffic management on Burnley Road
3. Delete the site from the Local Plan.
4. Consider suitable brownfield sites first.
5. The indicative developable area should be amended to reflect the conclusions of the HIA.
6. Amend Site Specific Consideration to ensure no harm to setting of heritage assets in the vicinity.

#### **Council's Response:**

1. No change required - While Policy SD2 makes no specific reference to SuDS, the policy requires that all

new development makes a positive contribution to sustainable development by addressing climate change through mitigation and adaption. Specific requirements are detailed in policies contained in the Addressing Climate Change chapter.

2. No change required - within the 'Site Allocations - Supporting Information' of the Local Plan a Transport Assessment and Travel Plan is required and 'Traffic Calming on Approach Roads' has been listed under Site Specific Considerations.

3. No change required - The allocation of the site is required to meet the Council's housing need. The allocation is considered to be consistent with the Council's site allocation methodology and positioning in the trajectory as set out in the Housing Technical Paper.

4. No change required - in order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area, only using the most sensitive Green Belt when all alternative sites were used.

5. No change required - The recommended Indicative Developable Area would not constitute substantial harm to the setting of the listed buildings. The Addendum to the Statement of Common Ground with Historic England will set out areas of agreement and disagreement with HE.

6. Agreed. The Council has prepared a Statement of Common Ground with Historic England, and has agreed amended wording for the Site Specific Considerations for sites included in the Publication Draft Local Plan. This wording will be amended for all additional sites in this consultation.

## Document Section: 13 Northowram and Shelf Additional Housing Sites

### Representations

Comment ID **HRU1021**

Site ref (if applicable):

Person ID: **1094062**

Name: **Miss Helga Oates**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

I have yet to see any evidence of the exceptional circumstances that are necessary for land to be removed from the Green Belt. There technical paper states -“Where new allocations are needed these are in sustainable locations close to existing or planned transport investments and established transport corridors. This approach balances environmental, social and economic factors and would enable the Council to adopt its Local Plan within an acceptable timescale, facilitate carefully planned investment and resist more damaging, ad-hoc, lower quality proposals which are likely in the absence of an adopted Local Plan. -“ The need for a Local Plan does not, to me constitute an exceptional circumstance especially as the sites fail to meet the criteria as Shelf & Northowram falls outside of the areas with planned transport investment and have limited public transport which because of the existing traffic congestion are subject to severe delays. Most of the proposed sites in the ward are along country roads regularly enjoyed by walking locals , the amenity is recognised to be a benefit to health and wellbeing. Should the greenbelt status be withdrawn and building commences local inhabitants will experience more pollution from the new houses and from the number of vehicles necessary to convey children to schools within Bradford or Calderdale (where ever school places can be located) and the adult population to work as the proposed industrial sites are not accessible by public transport from these villages. Surely given the emphasis being given by Local and National Government on Climate Change and the removal of land from the Green Belt is contrary to policy.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Remove the sites from the Plan keeping their currency green belt status

Comments:

Additional Evidence Link:

Comment ID **HRU1398**

Site ref (if applicable):

Person ID: **1171108**

Name: **Mr Brian Crossley (SNLPPF)**

Organisation: **Chairperson SNLPPF**

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

The need for more housing and additional sites in Shelf and Northowram We agree that there is a misalignment between the employment growth ambitions and the level of housing development being proposed in the Draft Published Local Plan (840dpa). Following the Stage 1 hearings in 2019 the inspector highlighted this misalignment and suggested two approaches to resolving it. -“ Further work may be necessary to assess the implications of housing need and requirement figures which align more closely with the Plan's economic strategy. Linked to this the Council may determine it necessary to identify additional housing sites. Or alternatively the Council may wish to revisit the economic strategy to better align with housing growth.” The main evidence being presented for the development of additional sites in Shelf and Northowram (indeed the whole borough) is the subsequent Aug 2019 Turley report -“Modelling the economic implications of the proposed housing requirement” However, the Turley report pointed out in several key paragraphs that it DID NOT take account of any benefits coming from the Councils Inclusive Economy Strategy and that this would require additional work. Since the time of that report the Council have steadfastly refused to carryout a review of their Economic Strategy and have instead decided to go with a higher housing figure, requiring the allocation of additional sites in Shelf and Northowram. In addition, NPPF para 137 states: 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.” Our capitalization). Clearly therefore, there is some scope for a LOWER housing figure than that being presented at this consultation (997dpa). Consequently we do not accept the need for additional sites in Shelf and Northowram, we do not accept how the evidence in the Turley report has been interpreted and we do not accept the Council's refusal to carry out a full, fair and quantified review of their Economic Strategy. Highways, traffic and environmental pollution CC35 -“Technical note on the impact of potential housing allocations on Hipperholme crossroads” and Technical Note 5 -“ Hipperholme sensitivity test” of the Transport Evidence base identify the already congested nature of the A58/A644 crossroads at Hipperholme. Technical note 4 identifies that the crossroads are highly sensitive to ANY increase in traffic volumes but we note that the emphasis has only been on sites in and around Hipperholme. Shelf and Northowram have only two small Primary Employment areas and there are no new ones proposed in the Local Plan. The villages have no secondary schools and sustainable public transport links to Brighouse are virtually non-existent. Brighouse provides a major service destination for employment, access to the Strategic road network, schools and shopping and this importance will only increase with the proposed employment areas and infrastructure improvements in Brighouse, creating an even greater 'draw' to people in Shelf and Northowram. Traffic from several of the sites in Shelf and Northowram (both those proposed in the Published LP and the Additional Sites listed in this consultation) egresses directly onto or is directed onto the A644 and inevitably through the Hipperholme crossroads in order to access the services listed above in Brighouse. This will inevitably lead to the increase in traffic volumes to which Hipperholme is highly sensitive as identified in Technical Note 4. Technical Note 4; (Assessment of Cumulative Impact) explained that the model predicted significant additional delays as a result of growth in other areas of Calderdale (and other districts) even without any developments within the local vicinity. It set out the following increases in delay between 2014 and 2032; almost 1 ½ minutes on Denholme Gate (A644), The

technical note also shows an additional delay of 2 mins on the eastbound A58 to northbound A644 in the pm peak. In the opinion of SNLPPF, the Council is ignoring the adverse impacts of development in Shelf and Northowram on the Hipperholme crossroads in order to meet an unevidenced housing need and this is ultimately unsustainable making the plan unsound.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1411**

Site ref (if applicable):

Person ID: **1243983**      Name: **Mr Martin Hey**      Organisation:

Agent ID:      Name:      Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Unclear

Do you consider the plan to be Sound?: **No**

Sound Reason:

In Northowram and Shelf, increased building will be ineffective at driving economic growth, but will soak up a significant amount of the council's scarce resources in future years. Total jobs in the ward are c2450 (Council data ; 2015). This is circa 1 job for every 3 economically active residents. Assuming a similar patterned of job creation is maintained, the majority of new residents will need to leave the ward for their jobs. However, the ward is so close to the Bradford and Leeds conurbations that a significant percentage of new residents will leave the borough for work. In other words, the housebuilding and subsequent inward migration will not lead to economic growth in the Borough, but will increase out-commuting, undermining Turley out-commuting assumptions. The council itself will be left with providing services to a larger population. Given the likely age profile of those attracted to this quiet area (highest average age in Calderdale), Social Care costs will be particularly heavy by 2033.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

If the main practical impact of building in Northowram and Shelf is to increase economic activity in Bradford and Leeds, Sustainable Development principles dictate that the additional homes should be built in these areas of the City Region, closer to the jobs.

Comments:

Additional Evidence Link:

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Comment ID **HRU1515**

Site ref (if applicable):

Person ID: **1244055**

Name: **Mr Andrew Wood**

Organisation: **Consultant Planner CPRE  
West Yorkshire**

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:

Sites LP1034, LP1035, LP1036 and LP1037 will cumulatively bring about the coalescence of Shelf (Calderdale) and Buttershaw (Bradford). None of these sites is readily accessible on foot or cycle to a good range of facilities or to employment areas, so they are not sustainably located. Sites LP 0766, LP1044 and LP1523 will cumulatively create unacceptable landscape impact, and are beyond reasonable walking distances to rail stations and town centres. LP0766, in particular, will undermine the open character of Northowram even though it is outside the Conservation Area, will damage the setting of Marsh Hall (Grade II\* listed) and, given the pinch point at the southern end of Upper Lane, the traffic generated by the 120 dwellings can only add to the existing air quality problem at Stump Cross. In CPRE's view the harm that results from these specific site allocations, individually and cumulatively, is unacceptable, and this weighs significantly against the justification of exceptional circumstances for their release from Green Belt.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

In line with our comments on Section 5 of the Plan, the approach to new site allocations should be reviewed, and the proposed additional sites in Northowram and Shelf should be removed from the Plan accordingly.

Comments:

Additional Evidence Link:

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Comment ID **HRU1686**

Site ref (if applicable):

Person ID: **512690**

Name: **Mr Graham Foster**

Organisation:

Agent ID:

Name:

Organisation:

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 consultation has come about due to the need to find additional residential sites in order to meet the Councils aspirational future employment figures. The economic climate has changed significantly since 2016, the current national direction is moving away from job creation and focussing on increasing productivity; this means increasing automation, and identifying efficiencies. This is evidenced by the fact that grant funding to business from the WYCA has moved away from job creation to productivity, in line with the priorities of the new Local Industrial Strategy (LIS). The proposed additional sites identified for Shelf (LP1034, LP1035, LP1036, LP1037) are all accessed via narrow unlit rural lanes, and in some cases without footpaths. There is no bus service giving direct access to these sites and they are outside the permitted walking distance for sustainability. It is likely therefore that journeys will be made by car. The local highway network in Northowram and Shelf is already congested, however no current or future traffic numbers have been provided in order that they may be discussed in the consultation. Overall demand for travel in Calderdale has grown by over 3% in the six years between 2012 and 2018. Shelf is unable to provide meaningful employment to meet the financial needs of persons residing at the proposed sites and they will need to travel to Halifax, Bradford, Leeds or further a field for employment. In order to do so they will need to use either the local bus service or private car. Bus use in the six year period has decreased by - 2% whilst car use has increased by 4%. These sites are predominately in the Green Belt the Councils assessment of such sites are generally inconsistent. Sites such as these are preferred by developers as they can maximise profit whilst minimising costs, but not necessarily building to meet the actual housing needs of the area.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

I am unable to comment on this.

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU208**

Site ref (if applicable):

Person ID: **1242096**

Name: **Mrs Linda Bristow**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**



Sound Reason:

This is precious greenbelt land within a quiet country village. The heart of this rural village would be greatly compromised by allowing this planning application to go through. It will take away the natural beauty that the village presents with its open fields, country lanes, the historic Marsh Hall and importantly the wildlife would be ecologically affected and their habitat would be disrupted greatly. The village would not be able to cope with the additional vehicles on the lanes, they are already narrow and would just not be able to cope with volume that will be using them. Additional housing would also require a larger schools and doctors surgery to cope with the influx of residents. I am greatly opposed to this proposition as we have enough housing to cope with the size of a small hamlet like ours. We want to keep the natural features of the village and surrounding area as a place of natural beauty and open space. We have no wish for this rural village to become an over populated area that will not be able to cope with the demands that will be placed on it if this planning application is allowed to go through.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU2335**

Site ref (if applicable):

Person ID: **1247033**

Name: **Mr/Mrs Unknown  
Unknown**

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:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5636976>

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Comment ID **HRU678**

Site ref (if applicable):

Person ID: **1182473**

Name: **Mr Peter Stowe**

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:

Northowram, for a village of its size, already has traffic problems, notably the stretch of road on Towngate. Parked cars throughout the day and night make this an obstacle course and double yellow lines on part of the road would help. The prospect of over one hundred more houses being built, all of them on green belt, will make a bad traffic situation considerably worse, not to mention the impact on the local school and doctors' surgery. Upper Lane and Hall Lane are used extensively by walkers, and the wildlife I have seen in the fields between the two lanes include a flock of redwing every winter, plus woodpeckers, long-tailed tits and a tree creeper. Bunney Green at the far end of Hall Lane has been flooded over the last two weekends and the fields there have standing water even when there has been a normal amount of rainfall. Is nature and open space worth nothing? This is not NIMBYism, merely trying to bring some rational debate to prevent future problems. Once the houses have been built they can't be "unbuilt" when someone realises it might not have been such a good idea after all.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU732**

Site ref (if applicable):

Person ID: **1242575**

Name: **Mr Alan Rushworth**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

I am not in a position to comment.

Do you consider the plan to be Sound?: **No**

#### Sound Reason:

One key consideration when determining new sites was restricting growth using Hipperholme traffic lights. Having examined the 'Technical Note on the Impact of Potential Housing Allocations on the Hipperholme Crossroads' it only considers potential developments in and around Hipperholme. Unfortunately, many Northowram and Shelf residents use these crossroads and any significant increase in housing, such as those proposed, will only add to the existing problems. This is particularly relevant as many of the planned additional jobs are going to be in the east of Calderdale. Also, assuming current practices continue to be applied, all the developments will be 3 or 4 bedroomed properties occupied by families. Unfortunately, this will only add further problems at Hipperholme traffic lights because the feeder secondary schools for Northowram and Shelf residents are based in Hipperholme. Northowram village is already severely congested with traffic and there is a severe problem with inappropriate parking of cars on pavements. This requires pedestrians, prams and wheelchairs to walk in the road creating potential hazards. Also, the lengthy traffic queues at Stump Cross are leading to 'rat runs' through Northowram village as drivers try to avoid the queues. More houses will only add to this problem. Northowram has already been identified as a -"poor air" zone needing action due to the level of traffic created at Stump Cross and these new properties will only cause the situation to deteriorate still further.

Do you consider that the plan complies with the Duty to Co-operate?:

#### Duty to Co-operate Reason:

I'm not in a position to comment.

#### Suggested Modifications:

Don't include any of the additional sites proposed.

Comments:

Additional Evidence Link:

## **Main Issues and Council Response**

### **Legal Compliance**

Main Issues:

Council's Response:

### **Test of Soundness**

Main Issues:

1. Ecology - impact on ecology
2. Brownfield site should be prioritised
3. Loss of Green Belt. Development of LP1034, 1035, 1036 and 1037 will lead to coalescence of Shelf and Buttershaw.
4. Local Road Network - impact on local road network including at Hipperholme where the Technical Note

(Examination Library CC35) does not address issues of traffic from Northowram and Shelf. Lack of employment opportunities locally will increase congestion. Road safety, sites accessed by narrow, unlit lanes. Traffic from the sites in Northowram and Shelf will increase the adverse impact of traffic congestion including on Hipperholme Cross Roads, which the Council are ignoring.

5. Impact on character of Northowram and Shelf.

6. Infrastructure - Lack of/pressure on existing amenities, services and facilities in the local area, e.g. schools, shops, doctors.

7. Increased risk of flooding.

8. The Council has not taken into consideration the Council's 'Inclusive Economic Strategy' which could potentially reduce the impact on additional housing requirement.

9. The economic climate has changed significantly since 2016, the current national direction is moving away from job creation and focussing on increasing productivity; this means increasing automation, and identifying efficiencies

10. LP0766, LP1044 and LP1523 do not constitute sustainable development they are beyond walking distances to rail stations and town centres. Due to the composition of the population in Northowram and Shelf and lack of employment opportunities, additional housing will lead to out commuting.

11. Development will add to the existing air quality issue at Stump Cross.

#### Council's Response:

1. Policies within the Green Infrastructure and Natural Environment chapter of the Local Plan, specifically Policy GN3, set out a clear and positive strategy to ensure the Council effectively manages its natural environment. The Site Assessment Report and Appendix 1 set out the mitigation and enhancement measures suggested by the Council's Conservation (Ecology) section.

2. With regards to the site assessment process, in order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area, only using the most sensitive Green Belt when all alternative sites were used.

The Council has published a Brownfield Land Register, which will provide up-to-date and consistent information on sites that the local authority considers to be appropriate for residential development having regard to the criteria set out in regulation 4 of the Town and Country Planning (Brownfield Land Register) Regulations 2017.

The allocation process requires a willing land owner and developer in order to demonstrate the deliverability of the sites and therefore whilst there are aspirations to use as much brownfield urban land as possible this may not always be demonstrably deliverable.

3. The purpose of the Green Belt Review is to provide an understanding of the current strengths and weaknesses of the existing Green Belt and provide the basis for recommendations to change the Green Belt where appropriate. In order to assess Green Belt land against the NPPF purposes, a set of questions for each purpose has been developed including the need to prevent neighbouring towns from merging into one another and to preserve the setting and special character of historic towns.

In terms of the site assessment process, in order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area, only using the most sensitive Green Belt when all alternative sites were used.

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. 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. 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.

4. The Council considers that the evidence submitted supports and justifies the content of the Local Plan. A Transport Statement would be required to assess any impact on the local road network and suggest any necessary mitigation measures. The IDP proposes a number of key schemes which will allow development in line with the aspirations of Calderdale while reducing the impacts on the transport network. The planned growth has been targeted spatially in areas where access to alternative modes of transport (other than the private car) are best, in order to reduce reliance on cars for travel.

5. The additional housing sites have not been identified as being in a Special Landscape Area, Conservation Area or other area of particular character importance. However, the Local Plan has a policy (BT1) to ensure development respects or enhances the character and appearance of existing buildings and surroundings.

6. The Infrastructure Delivery Plan is a compendium of projected infrastructure provision and it helps to ensure that this infrastructure is provided in a timely manner and in a coordinated and sustainable way. It sets out the infrastructure that will support the level of development that is proposed in the Calderdale Local Plan. The IDP is a living document, updated on at least a yearly basis and contains a chapter on healthcare and education provision.

7. 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.

8. The Council considers that the assessments undertaken are consistent with Regional, sub regional and local growth strategies, as evidenced at Examination Stage 1 Hearings. The Council's Inclusive Economic Strategy was adopted in 2018 and sets the framework for the delivery of aspirations for the period 2018-2024 in line with its Vision for 2024.

9. The Council considers that the methodology adopted in the Employment Land Study (EV1) and the Employment Technical Paper (EV02) meets the requirements of National Planning Policy Guidance. The approach uses the Regional Econometric Model which is a complex economic database and impact model for Yorkshire and Humber, and data in the model consists of historical employment, output, productivity, population estimates and forecasts, and other labour market and environmental information. The Model provides a consistent database which underpins the economic policies of the LEP and other Districts in the Leeds City Region.

10. The policies within the Local Plan support the achievement of the Local Plan Transport Objective, 'To ensure the provision of a sustainable, safe and efficient transport system which reduces car dependency and improves quality of life through a balance of promoting economic growth, enhancing environments and improving transport access for communities'

To achieve these objectives the Council is developing a range of strategies and interventions, and the Local

Plan has a role to play in supporting these, but also ensuring development proposals meet these objectives and contribute more widely to an integrated 'active mode' network.

The IDP proposes a number of key schemes which will allow development in line with the aspirations of Calderdale while reducing the impacts on the transport network. The planned growth has been targeted spatially in areas where access to alternative modes of transport (other than the private car) are best, in order to reduce reliance on cars for travel.

11. 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.

### **Duty to Co-operate**

Main Issues:

Council's Response:

### **Suggested Modifications**

1. In line with our comments on Section 5 of the Plan, the approach to new site allocations should be reviewed, and the proposed additional sites in Northowram and Shelf should be removed from the Plan accordingly.

Council's Response:

1. No change required - The Council considers that the evidence submitted supports and justifies the content of the Local Plan.

## Representations

Comment ID **HRU100**

Site ref (if applicable): **LP0766**

Person ID: **1124173**

Name: **Mr Lee Garside**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-" To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -"No impact on environmentally sensitive areas" However, it is not clear what is meant by -"environmentally sensitive areas" in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -"No impact on ANY heritage asset" Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -"no loss" or -"no impact" on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of

this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU104**

Site ref (if applicable): **LP0766**

Person ID: **1241667**

Name: **Mrs Natalie Pinder**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.



Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU1071**

Site ref (if applicable):

Person ID: **1243869**

Name: **Mrs Jane Stables**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

These are my comments for site LP0766 Land off Hall Lane Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU1086**

Site ref (if applicable):

Person ID: **1243871**

Name: **Mrs Barbara Pritchard**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

#### Sound Reason:

These are my comments for site LP0766 Land off Hall Lane Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. 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This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU1096**

Site ref (if applicable): **LP0766**

Person ID: **1124632**

Name: **Ms Leila Oates**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

These are my comments for site LP0766 Land off Hall Lane Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals, amphibians, invertebrates and flora which would be lost or at risk due to development. Some of the animals whose habitats would be lost or at risk due to

development are declining in numbers nationally. The site is also used as an access corridor by many mammal species moving between fields adjacent to Upper Lane and land adjacent to Lands Head Lane. Existing housing on Upper Lane prevents a direct route between these areas. Development would put this access corridor at risk. I believe that the site calls for an independent ecological review. Historic Environment: I am astounded that the Council's assessment is that there would be - "No impact on ANY heritage asset" Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. The stone barn is also recorded on the earliest OS maps. Other external and internal boundaries include stone walls that have been in existence for generations. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have - "no loss" or - "no impact" on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being - "surrounded on three sides by residential development" This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Comments:

Additional Evidence Link:

Comment ID **HRU111**

Site ref (if applicable): **LP0766**

Person ID: **1241707**

Name: **Mr Anthony Pye**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-"To preserve the setting and Character of Historic Towns]. The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-"To preserve the setting and Character of Historic Towns]. The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -"No impact on environmentally sensitive areas" However, it is not clear what is meant by -"environmentally sensitive areas" In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -"No impact on ANY heritage asset" Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -"no loss" or -"no impact" on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other: I disagree with the Council's description of this site as being -"surrounded on three sides by residential development" This is a gross exaggeration

that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland.

Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Site number LP0766 : Land off, Hall Lane, Northowram, Halifax, HX3 7SN Comment ID:HRU89 Response Date:30/01/20 10:33 Mr Eric Andrew Whitehead (ID: 1177730) PDF Site reference number (if applicable) LP0766 Legal Compliance Do you consider the plan to be Legally Compliant. Yes Sound Do you consider the plan to be Sound. No These are my comments for site LP0766 Land off Hall Lane Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the

children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. Duty to Co-operate Do you consider that the plan complies with the Duty to Co-operate Yes Modifications The site should be removed from the Local Plan

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1126**

Site ref (if applicable):

Person ID: **1130148**

Name: **Mr Richard Whiteley**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

These are my comments for site LP0766 Land off Hall Lane Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole.



Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have - "No impact on environmentally sensitive areas" However, it is not clear what is meant by - "environmentally sensitive areas" in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be - "No impact on ANY heritage asset" Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have - "no loss" or - "no impact" on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being - "surrounded on three sides by residential development" This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Remove the site from the local plan.

Comments:

Additional Evidence Link:

Comment ID **HRU1130**

Site ref (if applicable):

Person ID: **1130149**

Name: **Mrs Katie Whiteley**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

These are my comments for site LP0766 Land off Hall Lane Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU1150**

Site ref (if applicable):

Person ID: **1242399**

Name: **Mr Darren Hodgson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and

for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU1163**

Site ref (if applicable): **LP0766**

Person ID: **1242254**

Name: **Mr John Hegney**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Below are my comments for site LP0766 Land off Hall Lane Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [‐ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. The increase of new dwellings across Northowram and Shelf can only lead to more vehicles entering the already overburdened road infrastructure across the area. Taking account of only one car per house hold it would see a potential increase of over 900 cars entering these congested routes with the possibility of over 100 cars from this site alone. How does this fit with meeting with reducing carbon emissions and committing to stop the apparent Global climate emergency. Any extra traffic can on further impact on the pinch points of Queensbury lights, Shelf roundabout, Hipperholme traffic lights Stump cross traffic lights, Chain bar roundabout and the M62 chain bar/Leeds corridor. This section of motorway is already heavily congested at peak times despite it being a smart section of motorway. (see the Governments own current reports on smart motorways) Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunny Green and along Hall Lane which does not have an adequate surface water drainage system. This issue has been witnessed recently over the weekend of the 8th and 9th of Feb 2020. Building on this site could have serious implications by further impacting the natural dispersal of water from the surrounding hills possibly further impacting housing and infrastructure already in place. with regards to past mining in the area apparently building on old or close to disused mines could lead to possible collapse or land slip. If contaminated water or other substances were to leak as a result of tampering with such workings it could lead to environmental issues for the water courses that apparently run under Northowram village, (see document The Northowram village conservation area appraisal and Management plan page 12 section on historic breweries in the village.) This could then have an impact for the water courses in the two valleys that boarder the area (see environment agency document on abandoned mines and the water environment) On top of this according to many sources mines apparent leave us with another legacy to

contend with, the risk of sink hole activity (see the BBC programme sink hole Britain TV series Channel 5 ). When I purchased my house in 2004 I was clearly advised to carry out a full mining survey due to extensive mining which has taken place in the Northowram and Shibden area. Apparently much of this mining activity dates back to the 1800s, the survey I had carried out clearly identified mining activity in this area. It also identified the large spoil heap that borders houses on upper lane adjacent the proposed building site. Concern is that any tampering to mine workings on the proposed site could have significant effect from either land slip or Sink hole activity possibly putting bordering properties at risk. In any event if such a risk is present it should be made public knowledge as part of open transparent public disclosure. Ecology: The Council's assessment is that development on this site would have - "No impact on environmentally sensitive areas" However, it is not clear what is meant by - "environmentally sensitive areas" In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be - "No impact on ANY heritage asset" Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. There is also appears to be a large stone track way running from upper lane on one section of the land which could date back to the earliest mine workings on the site and consideration would need to be taken if this would be of historic importance. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have - "no loss" or - "no impact" on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Apparently the new agricultural bill commits to keeping more green space and appears to be in keeping with reducing our carbon footprint and reducing carbon omissions to meet with greening targets. Keeping open green belt also takes a significant step forward to our commitment to reduce the threat from global warming and recognising the climate emergency. Other : I disagree with the Council's description of this site as being - "surrounded on three sides by residential development" This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. by doing so this will reduce the need to rely on car use as transport links are readily more accessible within towns. I propose that the land remain as Green Belt to meet with the commitment to reduce the threat from global warming, while showing a commitment to reducing the carbon footprint for the area.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

I propose that the land remain as Green Belt to meet with the commitment to reduce the threat from global warming, while showing a commitment to reducing the carbon footprint for the area.

Comments:

Additional Evidence Link:

Comment ID

**HRU1171**

Site ref (if applicable):

Person ID: **1243916**

Name: **Mrs Veronica Cubitt**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [- "To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have - "No impact on environmentally sensitive areas" However, it is not clear what is meant by - "environmentally sensitive areas" In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be - "No impact on ANY heritage asset" Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's

site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU1178**

Site ref (if applicable): **LP0766**

Person ID: **1116724**

Name: **Miss Collette Mensah**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

These are my comments for site LP0766 Land off Hall Lane Greenbelt: I disagree with the Council's



Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [–“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have –“No impact on environmentally sensitive areas” However, it is not clear what is meant by –“environmentally sensitive areas” in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be –“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have –“no loss” or –“no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being –“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1209**

Site ref (if applicable):

Person ID: **1128166**

Name: **Miss Alice Simpson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU122**

Site ref (if applicable): **LP0766**

Person ID: **1241758**

Name: **Mrs Barbara Bartle**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five

purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” On Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU1223**

Site ref (if applicable): **LP0766**

Person ID: **1130391**

Name: **Miss Alison Grogan**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [–“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have –“No impact on environmentally sensitive areas” However, it is not clear what is meant by –“environmentally sensitive areas” In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be –“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service.

Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1228**

Site ref (if applicable):

Person ID: **1121978**

Name: **Mrs Bridget Simpson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the

nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt.

**Highways:** The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole.

**Environmental Health:** Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. This very nearly caused my daughters house to flood on Sunday 9th February and with the adjacent fields being built on there will be even more water, as there will be less ground for the water to absorb into. This is a grave concern.

**Ecology:** The Council's assessment is that development on this site would have - "No impact on environmentally sensitive areas" However, it is not clear what is meant by - "environmentally sensitive areas" in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development.

**Historic Environment:** I am astounded that the Council's assessment is that there would be - "No impact on ANY heritage asset" Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm.

**Accessibility:** I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport.

**Open Space:** I disagree with the Council's assessment that development of this site would have - "no loss" or - "no impact" on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas.

**Other :** I disagree with the Council's description of this site as being - "surrounded on three sides by residential development" This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland.

**Additional Comments:** This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU1239**

Site ref (if applicable): **LP0766**

Person ID: **1130670**

Name: **Mrs Lilian Grogan**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service.



Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU1242**

Site ref (if applicable):

Person ID: **1243907**

Name: **Miss Nicola Stoker**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

These are my comments for site LP0766 Land of hall lane Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To

preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have - "No impact on environmentally sensitive areas" However, it is not clear what is meant by - "environmentally sensitive areas" In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals, amphibians, invertebrates and flora which would be lost or at risk due to development. Some of the animals whose habitats would be lost or at risk due to development are declining in numbers nationally. The site is also used as an access corridor by many mammal species moving between fields adjacent to Upper Lane and land adjacent to Lands Head Lane. Existing housing on Upper Lane prevents a direct route between these areas. Development would put this access corridor at risk. I believe that the site calls for an independent ecological review. Historic Environment: I am astounded that the Council's assessment is that there would be - "No impact on ANY heritage asset" Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. The stone barn is also recorded on the earliest OS maps. Other external and internal boundaries include stone walls that have been in existence for generations. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have - "no loss" Or - "no impact" On Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being - "surrounded on three sides by residential development" This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social

infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1245**

Site ref (if applicable): **LP0766**

Person ID: **1102440**

Name: **Mrs Ann Harris**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is

subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: Historic Environment: I am astounded that the Council's assessment is that there would be - "No impact on ANY heritage asset" Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: Open Space: I disagree with the Council's assessment that development of this site would have - "no loss" or - "no impact" on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being - "surrounded on three sides by residential development" This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU1247**

Site ref (if applicable):

Person ID: **1243907**

Name: **Miss Nicola Stoker**

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:

These are my comments for site LP0766 Land off Hall Lane Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals, amphibians, invertebrates and flora which would be lost or at risk due to development. Some of the animals whose habitats would be lost or at risk due to development are declining in numbers nationally. The site is also used as an access corridor by many mammal species moving between fields adjacent to Upper Lane and land adjacent to Lands Head Lane. Existing housing on Upper Lane prevents a direct route between these areas. Development would put this access corridor at risk. I believe that the site calls for an independent ecological review. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. The stone barn is also recorded on the earliest OS maps. Other external and internal boundaries include stone walls that have been in existence for generations. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This

site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them. Modifications This site should be removed from the Local Plan Oral Examination Participation If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? No

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1252**

Site ref (if applicable):

Person ID: **1095919**

Name: **Mrs Samantha Livsey**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

These are my comments for site LP0766 Land off Hall Lane Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage

pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have - "No impact on environmentally sensitive areas" However, it is not clear what is meant by - "environmentally sensitive areas" in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be - "No impact on ANY heritage asset" Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have - "no loss" or - "no impact" on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being - "surrounded on three sides by residential development" This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU1253**

Site ref (if applicable): **LP0766**

Person ID: **1243899**

Name: **Mr Michael Sheehan**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

These are my comments for site LP0766 Land off Hall Lane Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [‐To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have ‐No impact on environmentally sensitive areas‐. However, it is not clear what is meant by ‐environmentally sensitive areas‐ in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be ‐No impact on ANY heritage asset‐. Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have ‐no loss‐ or ‐no impact‐ on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being ‐surrounded on three sides by residential development‐. This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder



being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU126**

Site ref (if applicable):

Person ID: **1241757**

Name: **Ms Joy Morris**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt The council says the site only fulfils 3 out of 5 of the green belt criteria but I would argue that it also fulfils Purpose IV as there are open views across fields to the north and Marsh Hall at the top of Hall Lane. Therefore, 4 out of 5 criteria are fulfilled. Highways The council has assessed that Upper Lane is unsuitable for site traffic so all site traffic would be pushed onto Hall Lane which is already often congested at the mini roundabout. All roads in Northowram are congested and access to the main road at rush hour is difficult. The main road itself is full to capacity at many times of the day. Environmental Health All the houses on Upper Lane have septic tanks which discharge into this site. The site does not have sufficient drainage and frequently floods into Hall Lane. The green site on the edge of the village provides health benefits both physical and mental to the residents of Northowram. Ecology The site has many mature trees and a small woodland at the South end. The loss of this habitat will affect birds and mammals that currently live there. Historic Environment The southern boundary is formed by a highly prized Grade II listed slab wall and at the North there is the Grade II listed Marsh Hall. Access The 533 and 534 buses run only once every 2 hours each and there are only 3 buses on Sundays. Thus residents will be very reliant on cars. Open Space The site has long been used for horse trials and therefore a loss to the children and young people of Northowram. Also parents frequently take their children to see the horses that live in the

field as they can easily walk from the village. Other This is not an infie site. Only the southern boundary could be considered to be 'built up' and even this is separated by a small woodland. Has the council also considered the impact of so many houses on Northowram Primary school and the doctors surgery?

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1268**

Site ref (if applicable): **LP0766**

Person ID: **1240178**

Name: **Mr Stephen Fearnley**

Organisation:

Agent 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:

There are approximately 80 identical copy paste objections to this site. This surely equals just one objection in effect? Of the 8 main points covered, 5 have no basis. 1. Marsh Hall "significantly affected" - no, there is a field between the proposed development and Marsh Hall 2. Upper Lane not suitable for extra traffic -no, entrance will be in Hall Lane, no effect on Upper Lane, Calderdale error 3. Trees to be lost - no, trees surrounding site are protected with a TPO 4. Grade 2 Slab Wall southern edge of site affected - no, this will be preserved 5. a.Poor accessibility to Bus routes - there are lots of bus choices 533/534 on Hall Lane every hour, 681/682 on Northowram Green regularly, plus 508 on the main Bradford Road very regularly. 5. b.Loss of open space use for horse trials - no, these ceased 2 years ago when Shibden Dale Riding Club closed

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

none

Comments:

Additional Evidence Link:

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Comment ID **HRU1272**

Site ref (if applicable):

Person ID: **1243949**

Name: **Mr Ian Livsey**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

These are my comments for site LP0766 Land off Hall Lane Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU132**

Site ref (if applicable): **LP0766**

Person ID: **1124475**

Name: **Mr Peter Horne**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU1327**

Site ref (if applicable):

Person ID: **1175701**

Name: **Mr Ian Smith**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1341**

Site ref (if applicable):

Person ID: **1181960**

Name: **Mrs Taryn Smith**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

These are my comments for site LP0766 Land off Hall Lane Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [–“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland)

that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have - "No impact on environmentally sensitive areas" However, it is not clear what is meant by - "environmentally sensitive areas" In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be - "No impact on ANY heritage asset" Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have - "no loss" or - "no impact" on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being - "surrounded on three sides by residential development" This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1424**

Site ref (if applicable): **LP0766**



Person ID: **1243983**

Name: **Mr Martin Hey**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Unclear

Do you consider the plan to be Sound?: **No**

Sound Reason:

There are numerous reasons why this specific site is unsuitable. Flooding The attached photo shows the consequences of recent storms, coupled with the building of the Arboretum Estate c10 years ago. Trapped water flooded a number of houses in Bunney Green and the Arboretum itself. The council acknowledges the risk of further building in the report, and propose -"Storm Water Storage" However, the size of this facility would need to be huge if it wasn't going to be quickly overwhelmed as Climate Change takes hold. This type of mitigation isn't acceptable, as the scale of Climate Change is uncertain and depends on worldwide action (What storage capacity does the council think would be required with a 3 degree temperature rise?). In addition, the situation in the Shibden Valley is becoming very serious, with regular flooding and landslips. It's not clear the role that continued building just over the watershed contributes, but it must have some effect. We would advocate no building within 500 metres of the watershed. The council should also note that sinkholes appeared just yards from the new development during the storms. The ability of this old mining land to accommodate housing and increasing rainfall is unclear. Wildlife This site is the last remaining real wildlife refuge in the village, due to the presence of trees, bushes and unmown grass. Other fields in the neighbourhood are farmers fields, largely devoid of biodiversity. The retention of trees mentioned in the document is worthless. Experience on other estates is that planning applications are quickly granted for the trees to be trimmed or removed, following completion of the building. Traffic The council mentions the implications on the Stump Cross junction from additional building, but it is unclear what can be done, other than tolerate longer queues and worse pollution. Newlands Grove is a serious bottleneck, but nor do residents want double-yellow lines that would prevent parking and convert the road into a racetrack. These social and environmental costs significantly and demonstrably outweigh the minimal per capita economic benefits that would accrue from the development, and as such, LP0766 should be excluded from the Revised Plan.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

The social and environmental costs of LP0766 significantly and demonstrably outweigh the minimal per capita economic benefits that would accrue from the development, and as such, LP0766 should be excluded from the Revised Plan. We would recommend that any building within 500 metres of the Shibden Valley is halted for the foreseeable future.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609794>

Comment ID **HRU143**

Site ref (if applicable): **LP0766**

Person ID: **1241783**

Name: **Mrs Julie Singh**

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:

In addition to the comments made by previous residents I believe the basic infrastructure of the local area of Northowram & Shelf could accommodate the increased population created by the proposed housing plan. The local child care and Junior Schools are already over subscribed so potentially could not accommodate the increased child numbers likely to be created by family homes to be built. The existing school provision causes severe congestion problems in the village at school starting & finishing times due to inappropriate parking. Increased child numbers could not be accommodated in the local schools so they will need to attend schools elsewhere requiring parents to travel, usually by car to school, adding to air pollution and not supporting local air pollution targets & proposed carbon neutral targets. The local Health care provision is provided by one GP practice, this is also over subscribed, this means accessing appointments with a GP very difficult and not within a timely manner. These proposed houses will increase the number of people needing to access this provision, reducing it further or need them to travel to other GP surgeries, with the environmental implications. The village of Northowram is already severely congested with traffic, there is a severe problem with inappropriate parking of cars on pavements, requiring prams & wheelchairs to walk in the road causing potential hazards to them. Northowram has already been identified as a -"poor air" zone needing action, due to the level of traffic created at Stump Cross, with people travelling to the M62, so increased traffic created by new properties will further worsen this. The lengthy traffic queues created at Stump Cross cause Northowram to become -"rat run" by people trying to avoid the queues. They often drive quite fast & erratically through the village, more houses will only add to this problem. People are entitled to live in a safe and secure environment. The proposed housing development will compromise all current residents opportunity to do so.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1445**

Site ref (if applicable): **LP0766**

Person ID: **1243995**

Name: **mr Timothy Cooper**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This

scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU1463**

Site ref (if applicable): **LP0766**

Person ID: **1242268**

Name: **Mr David Myles**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Green Belt - my understanding is that green field sites are only to be considered for building on in exceptional circumstances. The proposed site is currently used for gymkhanas and is an important part of village life, contributing to the semi-rural atmosphere of the village. Highways - the proposed site is sandwiched between two country lanes which are currently quiet enough to be used by people pushing buggies, walking or exercising dogs. Access to the site will cause congestion and pose a risk to people using theses lanes. The cottages at Bunny Green don't have off-road parking, meaning that the lane is often only passable in single file. Environmental Health - the recent rains have caused the site to become flooded with water pouring through the walls onto Hall Lane, making it impassable for some considerable time after the storm had passed. If this field is covered with concrete and tarmac, the situation will only get worse. Ecology - this site is surrounded by a variety of trees supporting a wide range of wildlife and birds. If these habitats are lost, the wildlife and birds will be lost and won't return. Historic Environment - due to certain historic buildings in the vicinity (Marsh Hall and Northowram Hall), the site does not lend itself to new-build properties. Accessibility - due to the scarcity of public transport, private cars would be the main mode of transport. This will mean increased congestion and pollution. Other - the proposed 120 dwellings on this site will increase the pressure on an infrastructure which is already inadequate to meet the needs of the present number of residents in the village. Roads, schools and health care are already struggling to cope and any further pressure on them will seriously impact the quality of life in the village.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan.

Comments:

Additional Evidence Link:

Comment ID **HRU1529**

Site ref (if applicable): **LP0766**

Person ID: **1183543**

Name: **Mr Chris Grogan**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service.

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU1535**

Site ref (if applicable): **LP0766**

Person ID: **1182599**

Name: **Miss Sarah Firth**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-" To preserve the setting and Character of Historic Towns] . The site is

bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” On Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU1536**

Site ref (if applicable): **766**

Person ID: **1244103**

Name: **Mrs Melanie Raine**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so



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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1568**

Site ref (if applicable): **LP0766**

Person ID: **1128520**      Name: **Mrs Kathryne Patchett**      Organisation:

Agent ID:      Name:      Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

No consultation with local residents, the schools and GP surgeries are at full capacity and will be unable to cope with the extra demand. The local roads and trunk roads are congested at the best of times and this will certainly not improve the situation. Building in these areas will only add to the already over populated villages which we cannot sustain.

Do you consider the plan to be Sound?: **No**

Sound Reason:

As above the villages are already at full capacity, if the application goes through then this greenbelt land will be greatly compromised. The building of houses has huge consequences adding to the flooded areas in the village, the water has no where to run and the impact will be catastrophic, the roads cannot cope with the everyday traffic, we currently have deer, badgers, bats, these are welcomed into the village and they were here before us, the local refuge collectors are struggling to do their role and we have been cut back to a collection every 2 weeks, the local postmen/women are struggling too to meet the demands of the service.

**Greenbelt:** I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [–“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt.

**Highways:** The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole.

**Environmental Health:** Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system.

**Ecology:** The Council's assessment is that development on this site would have –“No impact on environmentally sensitive areas” However, it is not clear what is meant by –“environmentally sensitive areas” In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development.

**Historic Environment:** I am astounded that the Council's assessment is that there would be –“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm.

**Accessibility:** I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport.

**Open Space:** I disagree with the Council's assessment that development of this site would have –“no loss” or –“no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas.

**Other :** I disagree with the Council's description of this site as being –“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland.

**Additional Comments:** This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and

cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

This needs to be removed from the local plan, this should remain greenbelt

Suggested Modifications:

This site needs to be removed from the local plan

Comments:

Additional Evidence Link:

Comment ID **HRU158**

Site ref (if applicable): **LP0766**

Person ID: **1241842**

Name: **miss stacey Barnes**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU1590**

Site ref (if applicable):

Person ID: **1244142**

Name: **Ind Josiah Bower**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of

development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Comments:

Additional Evidence Link:

Comment ID **HRU1592**

Site ref (if applicable): **LP0766**

Person ID: **1244139**

Name: **mrs Zuzanna Ellis**

Organisation:

Agent ID:

Name:

Organisation:

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 disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-"To preserve the setting and Character of Historic Towns]. The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Additionally the housing plan has been constructed in without full due diligence , there is limited consideration to Education Services, Accessibility, Healthcare services, Traffic measures and conservation. Any study phase has proven inconclusive to satisfy legitimate concerns over these elements. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets and rural road networks . Areas that are already facing challenges with congestion. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Such largescale development centred around semi rural infrastructure should require greater planning measures and precautionary measures to be implemented in advance of an influx of new vehicles. Environmental Health: Council's site assessment seems to be lacking in detailed knowledge and understanding of the site. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. The site frequently causes surface water flooding at Bunney Green and along

Hall Lane which does not have an adequate surface water drainage system, as highlighted during the two storms in February 2020 when the area was subjected to flooding. Events of which have been reported.

Ecology: The Council's assessment is that development on this site would have - "No impact on environmentally sensitive areas" However, it is not clear what is meant by - "environmentally sensitive areas" In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Frequently walking around the area, I often see bats, birds, bees, foxes, rabbits, squirrels etc. In the current ages with climate issues we are facing on a global scale it is irresponsible to lose any trees, especially very well established ones.

Historic Environment: I am astounded that the Council's assessment is that there would be - "No impact on ANY heritage asset" Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm.

Open Space: I disagree with the Council's assessment that development of this site would have - "no loss" or - "no impact" On Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas.

Other: I disagree with the Council's description of this site as being - "surrounded on three sides by residential development" This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland.

Additional Comments: This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites I propose that the land remain as Green Belt.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Modifications The site should remain Green belt and be protected from development

Suggested Modifications:

Modifications The site should remain Green belt and be protected from development

Comments:

Additional Evidence Link:

Comment ID **HRU1598**

Site ref (if applicable): **Yes**

Person ID: **1130635**      Name: **Mrs Hughes**      Organisation:

Agent ID:      Name:      Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“To preserve the setting and Character of Historic Towns]. The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other: I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This



scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Comments:

Additional Evidence Link:

Comment ID **HRU1604**

Site ref (if applicable): **LP0766**

Person ID: **1130221** Name: **Mrs Caroline Hegney** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” in the context of

this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -"No impact on ANY heritage asset"-Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -"no loss"or -"no impact"on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -"surrounded on three sides by residential development"-This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU1613**

Site ref (if applicable):

Person ID: **1129282**

Name: **Mrs Helen Rawlings**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of

development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU165**

Site ref (if applicable): **LP0766**

Person ID: **1241844**

Name: **Mr Adrian Balding**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees

and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -"No impact on ANY heritage asset" Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -"no loss" or -"no impact" on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -"surrounded on three sides by residential development" This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU1678**

Site ref (if applicable): **LP0766**

Person ID: **1123300**

Name: **Miss Melissa Hall**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this

proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU1683**

Site ref (if applicable): **LP0766**

Person ID: **1171108** Name: **Mr Brian Crossley (SNLPF)** Organisation: **Chairperson SNLPF**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: The Greenbelt assessment is that the site fulfils only 3 purposes of greenbelt and that it does not fulfil Purpose IV - "To preserve the setting and Character of Historic Towns". The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. We believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Sustainability: The SA for this site records 10 uncertain outcomes out of a possible 17. We disagree with several of the 'positive' outcomes, most notably access to employment opportunities, protection of biodiversity and protection of natural landscapes. Clearly these positive outcomes are not consistent with building on open greenbelt land in a rural setting with little access to local employment opportunities. There is even uncertainty in the text for some objectives recorded as showing a positive impact. There has been no attempt to address the uncertain outcomes and determine how, if at all, they can be turned into positives. Instead they are just left as a majority of unknowns so this evidence is of no use to a decision-maker, and of no use to the Examination Inspector. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: The Council's site assessment is woefully lacking in detail and knowledge of the area. The site is in a 'Development High Risk' area as shown on Coal Authority maps. Coal Authority and OS maps (National Library of Scotland) show that there are 9 Coal Pits and mine openings spread across the whole site with several clustered in the central, fenced off area. (see photos in file 'LP766 Flooding and mining images' attached) These mines have been flooded for many years with the water draining into the Shibden and

Chelsea valleys and eventually to Brighouse. There is anecdotal evidence that these mines were also partially back filled with ordnance left over from the first world war. Associated with the mines are large spoil heaps alongside Upper Lane which give testament to the extent of the underground workings. As well as the cluster of mines in the central area, maps show the remainder spread from Bunney Green in the north to near the southern boundary and there is grave concern amongst residents that disturbance of the mines and underground chambers caused by development will lead to subsidence of nearby properties and the potential for mine water contamination. It is clear from the Environment Agency document 'Abandoned Mines and Water Environment' (sorry, cannot upload more than one file) that developers rarely understand the extent of the problems or take the necessary steps to avoid them. In addition to the mines on the site a further issue has not been identified by Environment Health. This is that all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Again, there is grave concern among residents that development on the site will have a significant impact on property values and amenity. Finally, the site frequently suffers from surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. The frequency and extent of this flooding does not seem to be appreciated by Flooding and Drainage section but can be seen on the attached photos (see photos in file 'LP766 Flooding and mining images' attached) . This is becoming more severe and frequent as we see the impacts of climate change.

**Ecology:** The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development.

**Historic Environment:** We are surprised that the Council's assessment is that there would be -“No impact on ANY heritage asset” We refer the inspector to our comments above under Greenbelt without repeating them here.

**Accessibility:** We disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Worryingly, these incorrect accessibility assessments have been used to support positive outcomes in the Sustainability Assessment so they have a double impact.

**Open Space:** We disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” on Open Space. This site has been regularly used over many years for horse trials and gymkhanas which would be a great loss to the community and for the children of Northowram and surrounding areas.

**Other :** We disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This seems a deliberately attempt to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland.

**Additional Comments:** This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead the focus of development in Calderdale's Local Plan should be on the regeneration of brownfield sites in sustainable town centres.



Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

We propose that the land remain as Green Belt. With so many significant constraints and uncertain sustainability outcomes, Exceptional Circumstances for removal of land from the green belt CANNOT be demonstrated and this MOST SENSITIVE site must remain as greenbelt and be taken out of the plan.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5610307> ; <http://calderdale-consult.objective.co.uk/file/5610191> ; <http://calderdale-consult.objective.co.uk/file/5610188>

Comment ID **HRU1704**

Site ref (if applicable): **LP0766**

Person ID: **1024946**

Name: **Mr D R Witcher**

Organisation: **Planning Officer Shibden Valley Society**

Agent ID: **1024940**

Name: **Mr D R Witcher**

Organisation: **Planning Officer Shibden Valley Society**

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

This is the largest of the sites proposed for Northowram & Shelf, with an indicative capacity of 120 dwellings. It is technically outside the Northowram Village Conservation Area (less than 200 yards way) but because of its size, it will damage the historic open character of the village. The site is included in Parcel 194-00 in the Green Belt Review 2017. It was assessed as meeting 4 of the 5 purposes of the Green Belt and was designated as High Sensitivity. While it remains within the Green Belt, the site effectively prevents the westward sprawl of Northowram into land that had previously not been designated for housing. The development of the site, which is only 156m from Marsh Hall built in 1626 (Grade II\*, wrongly stated as only Grade II in the Site Assessment Report) will damage the setting of Marsh Hall. The Site Assessment Report states that the flooding issues at Hall Lane and Bunny Green have been resolved, but the recent floods there demonstrate that resolution has not been achieved. The Highways England comment in the Site Assessment Report acknowledges that the cumulative effect of the Council's proposals in the wider area (of which this site is a part) will have an adverse effect on the Strategic Road Network. The Highways Development Management comment also accepts that traffic from this site is likely to impact on the Stump Cross Junction, which is already an air pollution problem area. The airy reference to mitigation without any details of what might be done, inspire little confidence that there will be effective mitigation on any useful timescale. The Sustainability Appraisal Report is a weak document and claims 10 uncertain scores 6, with 6 positive. Our judgement is that Objectives 6, 8, 11 and 13 should be scored as negative, which would give 7 uncertain, 5 positive and 4 negative. Fundamentally, this site is unnecessary to the achievement of the Council's housing requirement, even accepting that the latter is over-stated because of

the weakness in assessing the population and job projections on which it is based. Further concentration on brownfield/underutilised land, together with the application of higher housing densities, should enable the Council's objectives to be achieved without taking land from the Green Belt. The latter cannot presently be justified in the terms required by either version of the NPPF. The site should be removed from the Local Plan.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

The site should be removed from the Local Plan.

Comments:

Additional Evidence Link:

Comment ID **HRU1706**

Site ref (if applicable): **LP0766**

Person ID: **1126186**

Name: **Mr Andrew Spence**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

These are my comments for site LP0766 Land off Hall Lane Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not

clear what is meant by -“environmentally sensitive areas” in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be - “No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have - “no loss” or - “no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being - “surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Comments:

Additional Evidence Link:

Comment ID **HRU1736**

Site ref (if applicable):

Person ID: **1128177**

Name: **Ms Shauna Delaney**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This

scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU1760**

Site ref (if applicable): **LP0766**

Person ID: **1128154**      Name: **Mrs Cat Horsfall**      Organisation:

Agent ID:      Name:      Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” in the context of

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

should remain green belt

Comments:

Additional Evidence Link:

Comment ID **HRU1768**

Site ref (if applicable):

Person ID: **1244222**

Name: **Mr David Whelan**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

#### Legal Compliance Reason:

Green belt is protected for the people. What example are we setting, if we continue to allow green belt to be built on? We and you as planners need to start taking responsibility for protecting our green spaces for the health and social wellbeing of communities as well as the wildlife. My children too are upset that this could happen. Brown field sites must be the priority to meet the housing shortage that the government claims to be. The only reason green site is being considered is because it is easier and cheaper to build on! We have a moral obligation to regenerate brown field sites! Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. 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scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider the plan to be Sound?: **No**

Sound Reason:

The infrastructure in terms of roads, schools and drainage issues have not been considered. The site cannot cope with the level of traffic this would generate.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This cannot be land that is built on. A lot of people have provided evidence against your criteria. What about other issues? Ones like we are ruining our natural landscape, where film crews come from all over to film Where we have local events and people come to walk run and enjoy for their mental health. Where we have a lot of wildlife that needs the environments we are keen to destroy. We condemn other places in the world for how they are acting in a world where climate change is changing the face of the earth, yet we do exactly the same thing. Halifax council take note of these points and be a leader, be responsible and look at other sites already damaged by humans. not natural areas of beauty, where we can make a difference to peoples wellbeing and support climate change!

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5610758>

Comment ID **HRU177**

Site ref (if applicable): **LP0766**

Person ID: **1241878**      Name: **mr stephen collingwood**      Organisation:

Agent ID:      Name:      Organisation:

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 Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. Hall Lane itself is difficult to egress from the Landshead Lane end of the road, pushing, if 120 houses are built, approx. 240 cars twice a day through the roundabout at Northowram Green. This is where Calderdale council have given permission for assisted living accommodation to be built. Cars will be pushed down Newlands Grove, an already busy residential Street and bus route, or through the village



down Lydgate to an extremely busy and at times dangerous crossroad junction. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN The land on the East side of Halifax Road between Shelf roundabout and 22 The Smoke House would give a better access from a transport perspective ie car access/egress and public transport connections

Comments:

Additional Evidence Link:

Comment ID **HRU1771**

Site ref (if applicable):

Person ID: **1244222**

Name: **Mr David Whelan**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Green belt is protected for the people. What example are we setting, if we continue to allow green belt to be built on? We and you as planners need to start taking responsibility for protecting our green spaces for the health and social wellbeing of communities as well as the wildlife. My children too are upset that this could happen. Brown field sites must be the priority to meet the housing shortage that the government claims to be. The only reason green site is being considered is because it is easier and cheaper to build on! We have a moral obligation to regenerate brown field sites! Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-" To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which

does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have - "No impact on environmentally sensitive areas" However, it is not clear what is meant by - "environmentally sensitive areas" In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be - "No impact on ANY heritage asset" Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have - "no loss" or - "no impact" On Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being - "surrounded on three sides by residential development" This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider the plan to be Sound?: **No**

Sound Reason:

The infrastructure in terms of roads, schools and drainage issues have not been considered. The site cannot cope with the level of traffic this would generate.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This cannot be land that is built on. A lot of people have provided evidence against your criteria. What about other issues? Ones like we are ruining our natural landscape, where film crews come from all over to film Where we have local events and people come to walk run and enjoy for their mental health. Where we have a lot of wildlife that needs the environments we are keen to destroy. We condemn other places in the world for how they are acting in a world where climate change is changing the face of the earth, yet we

do exactly the same thing. Halifax council take note of these points and be a leader, be responsible and look at other sites already damaged by humans. not natural areas of beauty, where we can make a difference to peoples wellbeing and support climate change!

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5610760>

Comment ID **HRU1779**

Site ref (if applicable):

Person ID: **1244222**

Name: **Mr David Whelan**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Green belt is protected for the people. What example are we setting, if we continue to allow green belt to be built on? We and you as planners need to start taking responsibility for protecting our green spaces for the health and social wellbeing of communities as well as the wildlife. My children too are upset that this could happen. Brown field sites must be the priority to meet the housing shortage that the government claims to be. The only reason green site is being considered is because it is easier and cheaper to build on! We have a moral obligation to regenerate brown field sites! Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-" To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have - "No impact on environmentally sensitive areas" However, it is not clear what is meant by - "environmentally sensitive areas" In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be - "No impact on ANY heritage asset" Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The

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Do you consider the plan to be Sound?: **No**

Sound Reason:

The infrastructure in terms of roads, schools and drainage issues have not been considered. The site cannot cope with the level of traffic this would generate.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This cannot be land that is built on. A lot of people have provided evidence against your criteria. What about other issues? Ones like we are ruining our natural landscape, where film crews come from all over to film Where we have local events and people come to walk run and enjoy for their mental health. Where we have a lot of wildlife that needs the environments we are keen to destroy. We condemn other places in the world for how they are acting in a world where climate change is changing the face of the earth, yet we do exactly the same thing. Halifax council take note of these points and be a leader, be responsible and look at other sites already damaged by humans. not natural areas of beauty, where we can make a difference to peoples wellbeing and support climate change!

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5610763>

Comment ID **HRU178**

Site ref (if applicable): **LP0766**

Person ID: **1181746**

Name: **Mr Philip Cannon**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

I would like to lodge an objection to LP0766. Firstly, traffic generated by this development would have to use the mini roundabout on Northowram Green, right outside of the now closed down Yew Tree pub, which at this very moment is being converted into apartments and the car park developed into housing. At peak times, Northowram Green is already heavily congested. So a development like LP0766, on top of the one that is already in progress, would only worsen the situation and create a serious bottleneck at this mini roundabout. The only other access to LP0766 is via a country lane a few hundred yards beyond this site ; a narrow, winding lane that is simply not equipped to handle any volume of traffic. I also strongly disagree with the Council when they say this site is surrounded on three sides by residential development. This is an incredibly misleading statement. This field is on the fringe of the village, and the residential area to the south is hidden behind trees. If you look out from Hall Lane, residential development on the other side of the field is hardly noticeable. The same applies to the north. This field has an extremely open aspect. It is almost like being out in the country. In recent years there has been an enormous amount of development in this particular area of Northowram: the hospital off Northowram Green was demolished and turned into housing; a turkey farm opposite this became housing (Yarborough Croft); a small farm off Hall Lane was demolished and turned into housing; and a couple of fields behinds this were filled with houses. All of this within a really tight area. It is my opinion that the village simply cannot handle any more large scale developments ; especially some sprawling monster like LP0766. Hall Lane is also prone to surface flooding. At times, quite severe flooding. And lastly, this field is often used for horse trials and other events. So for the village to lose a piece of greenbelt like this, and the problems that would be created, really would be a tragedy. It is for these reasons I think LP0766 should be removed from the Local Plan.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU181**

Site ref (if applicable): **LP0766**

Person ID: **1094062**

Name: **Miss Helga Oates**

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: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: The Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: The Council's assessment that there would be -“No impact on ANY heritage asset” is incorrect . The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically

change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site must remain Green Field in Greenbelt and be removed from the Local Plan.

Comments:

Additional Evidence Link:

Comment ID **HRU185**

Site ref (if applicable):

Person ID: **1116615**

Name: **Mrs Cathryn Zurek**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” in the context of

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU190**

Site ref (if applicable): **LP0766**

Person ID: **1241980**

Name: **Mrs Claire Walker**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**



Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

It is not viable that the infrastructure of this village can accommodate an extra 180 homes which will be family homes. The doctors and the area around there is already an accident waiting to happen jam packed with cars all day long, the main route through the village becomes a bolt neck and cars trying to squeeze past each other in an already full village. The school certainly doesn't have the capacity to take more children and is already over run with the cars at school drop off and pick up. The road that's been deemed suitable for access is narrow and busy already. Previously when the houses were built in the hospital grounds it was deemed not suitable for heavy traffic, another potential 180 cars will make the village unbearably busy and the already stretched GP resources will reach breaking point.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU194**

Site ref (if applicable): **LP0766**

Person ID: **1241984**

Name: **Mrs Claire Walker**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

It is not viable that the infrastructure of this village can accommodate an extra 180 homes which will be family homes. The doctors and the area around there is already an accident waiting to happen jam packed with cars all day long, the main route through the village becomes a bolt neck and cars trying to squeeze past each other in an already full village. The school certainly doesn't have the capacity to take more children and is already over run with the cars at school drop off and pick up. The road that's been deemed suitable for access is narrow and busy already. Previously when the houses were built in the hospital grounds it was deemed not suitable for heavy traffic, another potential 180 cars will make the village unbearably busy and the already stretched GP resources will reach breaking point.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU2011**

Site ref (if applicable):

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?:

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION This site was previously proposed to be allocated in the Local Plan Initial Draft (2017) and was only removed from the Publication Draft of the Plan following the Council's decision to set a lower housing requirement using the government's standard method for assessing local housing needs. The Council has therefore already concluded that the site is a suitable and sustainable location for housing and it is therefore entirely logical and reasonable that this site is now to be allocated in the context of a higher housing requirement. The removal of the site from the Green Belt is considered to be justified. The strength of the revised Green Belt boundary will not be compromised as a result of the allocation. The TPO woodland at the site would remain and would form an integral landscape feature within the development. A Transport and Highways Assessment has been undertaken which shows that the site is accessible and a suitable access can be provided from Hall Lane ; Upper Lane would not be required for vehicular access. The heritage appraisal at Appendix 1 of this representation has demonstrated that there is no need to remove the northern parcel of the site from the developable area, and that there is historical precedent for the reinstatement of the woodland belt at the northern part of the site which would screen any development from Marsh Hall. The site is capable of delivering 170 ; 180 homes.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5632539>

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Comment ID **HRU209**

Site ref (if applicable):

Person ID: **1121374**

Name: **Mrs Nicola Parker**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU216**

Site ref (if applicable): **LP0766**

Person ID: **1242100**

Name: **Mrs Carolyn 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:

These are my comments for site LP0766 Land off Hall Lane Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [“To preserve the setting and Character of Historic Towns”]. The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are

spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have - "No impact on environmentally sensitive areas" However, it is not clear what is meant by - "environmentally sensitive areas" In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be - "No impact on ANY heritage asset" Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have - "no loss" or - "no impact" on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being - "surrounded on three sides by residential development" This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

These are my comments for site LP0766 Land off Hall Lane Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [- "To preserve the setting and Character of Historic Towns"] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided,

preventing an informed understanding of future problems, at this site and for the area as a whole.

**Environmental Health:** Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system.

**Ecology:** The Council's assessment is that development on this site would have - "No impact on environmentally sensitive areas" However, it is not clear what is meant by - "environmentally sensitive areas" in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development.

**Historic Environment:** I am astounded that the Council's assessment is that there would be - "No impact on ANY heritage asset" Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm.

**Accessibility:** I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport.

**Open Space:** I disagree with the Council's assessment that development of this site would have - "no loss" or - "no impact" on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas.

**Other :** I disagree with the Council's description of this site as being - "surrounded on three sides by residential development" This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland.

**Additional Comments:** This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU218**

Site ref (if applicable): **LP0766**

Person ID: **1242100**

Name: **Mrs Carolyn Brook**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

These are my comments for site LP0766 Land off Hall Lane Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” On Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new

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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:

Comments:

Additional Evidence Link:

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Comment ID **HRU226**

Site ref (if applicable): **LP0766**

Person ID: **1242100**

Name: **Mrs Carolyn 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:

These are my comments for site LP0766 Land off Hall Lane Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [‐ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site



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Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2264**

Site ref (if applicable):

Person ID: **1246937**

Name: **Emma Sharpe**

Organisation: **Inspector of Historic**

## Buildings and Areas

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 FOR FULL REPRESENTATION The site specific considerations for several of the proposed allocations refer to -“consideration of recommendations in the Heritage Impact Assessment” In order for the development of these allocations to be compatible with not only national policy guidance but also the Plan's policies for the conservation of the historic environment, these mitigation measures need to be implemented as part of any development proposals. Consequently, mitigation measures need to be firmly and effectively tied into any eventual site specific policies. Unfortunately, as worded, the policy suggests that development need only 'consider' the recommendations, with no requirement for the design of a scheme to put into effect the proposed mitigation measures. We therefore consider it has not been shown that these sites could be developed in a manner which would not harm the setting of heritage assets in the vicinity. This is an issue we raised at Publication Draft stage (our letter of 18 September 2018). We are currently working on a Statement of Common Ground with your authority, aiming to agree wording to effectively tie the recommendations of the Heritage Impact Assessments to the relevant Local Plan policies. If it is proposed to proceed with the additional site allocations we recommend this would also apply to those sites.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Amend Site Specific Consideration to ensure no harm to setting of heritage assets in the vicinity.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5635295>

Comment ID **HRU2286**

Site ref (if applicable):

Person ID: **1246971**

Name: **Mr G M Burve**

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:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5635603>

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Comment ID **HRU2287**

Site ref (if applicable):

Person ID: **1246973**

Name: **Mr John Watkins**

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:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5635610>

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Comment ID **HRU2292**

Site ref (if applicable):

Person ID: **1246982**

Name: **Mr M Oakes**

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:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5635656>

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Comment ID **HRU2305**

Site ref (if applicable):

Person ID: **1246989**

Name: **Miss Rebecca 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:

See attached

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5635670>

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Comment ID **HRU232**

Site ref (if applicable): **LP0766**

Person ID: **1116568**

Name: **Mrs Pauline Stead**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of

development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU233**

Site ref (if applicable): **LP0766**

Person ID: **1120678**

Name: **Miss Lizzie Benn**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU242**

Site ref (if applicable):

Person ID: **1125735**

Name: **Ms Emma Taylor**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt:- I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [“To preserve the setting and Character of Historic Towns”]. The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways:- The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health:- Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology:- The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment:- I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility:- I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space:- I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other:- I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: - This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land



remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU243**

Site ref (if applicable):

Person ID: **1130909** Name: **Mr Muhammad Azhar Ullah** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: The Council's own assessment states that this site fulfils four of the five purposes of Greenbelt. It provides an important buffer between the settlements of Northowram and Shelf and prevents ribbon development along the A644 towards Queensbury. Highways: Access is not possible onto Score Hill as it is a single-track road with poor sight lines. Highways DM acknowledge the difficulty of access for this site onto the A644 and state that the site should be incorporated with LP1045 in order to give adequate frontage for sight lines. However, LP1045 has been removed from the proposed allocations. A Transport Assessment, Travel Plan and Drawing depicting how a new access can be created to adoptable highway standards should be provided BEFORE allocating this site. Car trips generated by the proposed 45 houses would increase congestion at the important Shelf roundabout. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental: The developable area shows Hud Hill farm being completely washed over by development, surely this beautiful and centuries old farmhouse is not to be destroyed for the sake of modern housing? This would be a travesty. Ecology: There are hedgerows, field walls and a field pond included in the developable area with the possibility of significant harm to amphibians and other wildlife. A full, independent Ecological Survey should be carried out BEFORE allocating this site, as recommended by Conservation (Ecology) Section. Accessibility: I disagree with some of the journey times shown in the council's site assessment. For example, using WY Metro 'Journey Planner' software the journey time to Town Centre at Mon a.m. peak is between 24 and 26 mins, almost twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on

narrow local roads and other social infrastructure. Instead the focus of development in Calderdale's Local Plan should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU244**

Site ref (if applicable):

Person ID: **1131102**

Name: **Mr Phil Taylor**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt:- I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways:- The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health:- Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology:- The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” in the context of this site. A site does not have to be environmentally sensitive to have an impact

on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment:- I am astounded that the Council's assessment is that there would be -"No impact on ANY heritage asset" Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility:- I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space:- I disagree with the Council's assessment that development of this site would have -"no loss" or -"no impact" on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other:- I disagree with the Council's description of this site as being -"surrounded on three sides by residential development" This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: - This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU245**

Site ref (if applicable):

Person ID: **1131193**

Name: **Mrs Susan Taylor**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt:- I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways:- The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health:- Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology:- The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment:- I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility:- I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space:- I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” On Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other:- I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: - This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

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Comment ID **HRU27**

Site ref (if applicable): **LP0766**

Person ID: **1130861**

Name: **Mr Nigel Redman**

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 volume of traffic in the village is significant with Newlandsgrove reduced to a single lane of traffic and cars are always parked on the pavement meaning pedestrians with wheels chairs, prams, etc cannot use the pavement and have to walk in the dangerous road. Similarly on the Green the volume of traffic at school drop off and pick up times is excessive and adding more houses in the village will make the current problem worse. This is also green site and the council have a duty to stop the further expansion.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU276**

Site ref (if applicable): **LP0766**

Person ID: **1124482**

Name: **Mr Ben Stables**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

## Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

## Sound Reason:

These are my comments for site LP0766 Land off Hall Lane Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have - “No impact on environmentally sensitive areas” However, it is not clear what is meant by - “environmentally sensitive areas” in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be - “No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have - “no loss” or - “no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being - “surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and

cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan

Comments:

Additional Evidence Link:

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Comment ID **HRU283**

Site ref (if applicable): **Lp0766**

Person ID: **1242263**

Name: **Mr Ben Jones**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Northowram is a village, building all these new houses is potentially going to turn it into a mini town. It is going to become over populated and more polluted. The village can not cope with the amount of traffic as it is ,building all these houses is just going to make matters worse. There won't be enough places in the local schools and people won't be able to register at the Doctors or get appointments.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU291**

Site ref (if applicable): **LP0766**

Person ID: **1130207**

Name: **Mrs Andrea Warrington**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” On Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new



housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” On Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the

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Comments:

Additional Evidence Link:

Comment ID **HRU294**

Site ref (if applicable):

Person ID: **1242209**

Name: **Mrs Jane Mackenzie**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is

surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -"No impact on ANY heritage asset"-Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -"no loss" or -"no impact" on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -"surrounded on three sides by residential development"-This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU304**

Site ref (if applicable): **LP0766**

Person ID: **1130805**

Name: **Mrs Eileen Mensah**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“To preserve the setting and Character of Historic Towns]. The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” On Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other: I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of

development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU323**

Site ref (if applicable): **LP0766**

Person ID: **1242384**

Name: **Mrs Michelle Cranswick**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt:- I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-"To preserve the setting and Character of Historic Towns]. The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways:- The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health:- Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology:- The Council's assessment is that development on this site would have -"No impact on environmentally sensitive areas"-However, it is not clear what is meant by -"environmentally sensitive areas"-In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU330**

Site ref (if applicable):

Person ID: **1122023**

Name: **Miss Rachel Cubitt**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this

proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU360**

Site ref (if applicable): **LP0766**

Person ID: **1242416**

Name: **Mr Ian Thewliss**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-" To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -"No impact on environmentally sensitive areas" However, it is not clear what is meant by -"environmentally sensitive areas" in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -"No impact on ANY heritage asset" Have they even been to look at the site? The



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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan.

Comments:

Additional Evidence Link:

Comment ID **HRU363**

Site ref (if applicable): **LP0766**

Person ID: **1242412**

Name: **Miss Janine Benner**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the

five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” On Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This plan should be removed from the local plan.

Comments:

Additional Evidence Link:

Comment ID **HRU367**

Site ref (if applicable):

Person ID: **1242423**

Name: **Miss Penny Provis**

Organisation:

Agent ID:

Name:

Organisation:

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 disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-"To preserve the setting and Character of Historic Towns]. The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -"No impact on environmentally sensitive areas"-However, it is not clear what is meant by -"environmentally sensitive areas"-In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -"No impact on ANY heritage asset"-Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service.

Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other: I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

I suggest it is removed from the plan

Comments:

Additional Evidence Link:

Comment ID **HRU37**

Site ref (if applicable): **LP1101**

Person ID: **1240534**

Name: **Mr Philip Sharples**

Organisation:

Agent ID:

Name:

Organisation:

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 traffic on the road between Horsfall Playing Fields towards Bradford and Shelf roundabout is already at breaking point and a linear single road is not built to accommodate an increase of traffic to at least 330

homes in the area. There is no possible way to increase the capacity of the local roads. There is insufficient social sector resources including public transport, doctors, dentists, schools to support this and other proposed increases. Your inability to guarantee no change to the water course for the properties lying at the bottom of the fields on Wadehouse Rd is also inappropriate and I would expect as a minimum if the build does take place written guarantees that should future flooding take place fiscal recompense would be applicable. The main road already floods as the drains and land cannot cope in times of heavy rain. Your response to comments in ALP1101 are laughable. Accessibility modelling has taken place etc etc. Buses are frequently late already, leaving home after 7am involves clearing congested roads already without these properties being built. To be clear. The enclosed documents state little or no issues with this site. I fundamentally disagree and want my complaint lodged in the strongest possible terms. This Local Plan is unacceptable.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Do not build!!!

Comments:

Additional Evidence Link:

Comment ID **HRU370**

Site ref (if applicable):

Person ID: **1242430**

Name: **Mrs Laura Green**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

These are my comments for site LP0766 Land off Hall Lane Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [‐ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland)

that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have - "No impact on environmentally sensitive areas" However, it is not clear what is meant by - "environmentally sensitive areas" In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be - "No impact on ANY heritage asset" Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have - "no loss" or - "no impact" on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being - "surrounded on three sides by residential development" This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU373**

Site ref (if applicable): **LP0766**

Person ID: **1242430**

Name: **Mrs Laura Green**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU377**

Site ref (if applicable): **LP0766**

Person ID: **1183442**

Name: **Mr Daniel Cook**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking



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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU386**

Site ref (if applicable): **LP0766**

Person ID: **975323** Name: **Mr Charles Shaw** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

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Comment ID **HRU395**

Site ref (if applicable): **LP0766**

Person ID: **975323**

Name: **Mr Charles Shaw**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

It looks very much that most of the housing development is taking place in the East of the borough and very little in the West. I do not think the comment from planning that land in the west is unsuitable due to terrain difficulties, after all in Switzerland they build on the side of mountains. Maybe the planners should task the building companies to build in the west not on flat green belt sites in the east.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

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Comment ID **HRU396**

Site ref (if applicable):

Person ID: **1242490**

Name: **Ms Helen wandiak**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” On Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU403**

Site ref (if applicable): **LP0766**

Person ID: **1092925**

Name: **Mrs Jean Maria Shaw**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

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Comment ID **HRU411**

Site ref (if applicable): **LP0766**

Person ID: **1125530**

Name: **Mrs Sarah Haigh**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

These are my comments for site LP0766 Land off Hall Lane Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [“To preserve the setting and Character of Historic Towns”]. The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have “No impact on environmentally sensitive areas”. However, it is not clear what is meant by “environmentally sensitive areas” in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be “No impact on ANY heritage asset”. Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have “no loss” or “no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the

children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU416**

Site ref (if applicable): **LP0766**

Person ID: **1139618**

Name: **Miss Karen Wardle**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane



is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. Hall Lane is not a suitable road for this increased traffic. I drive this road on a regular basis and there is one blind bend towards the Doctors/roundabout junction (bringing you out onto a new set of buildings). This corner is particularly bad and a tight corner. The Lane at the other end has a blind junction to pull out of due to a high wall. You can't see whilst pulling out at all and have to nudge into the road to get a view. It is a really bad junction. Coupled with the fact if you turn towards Marsh Hall the road narrows and is impossible to fit 2 vehicles through at the same time. I would also note as the traffic is pushed into Northowram, Shelf and Shibden the roads will become severely congested. I live on Brow Lane, Shibden and the road is not coping with the traffic coming down it. Literally just today part of it has collapsed. A few years ago the road was closed for 2 years due to collapse. The country roads in this area are not made to cope with the traffic pressure. I regularly use Shelf roundabout and that is becoming dangerous due to the pressure of traffic reaching it. More houses, more cars, increased danger, more bad tempered people being stuck in traffic. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole.

**Environmental Health:** Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. This has happened this week due to Storm Ciara. Without all the trees currently on the site, without the scrubland and grass areas this flooding will increase. Roads, houses are not permeable to water. You will be increasing the floor area covered with impermeable tarmac and concrete - increased run off with nowhere to go. Grass and trees take the pressure off the system, absorb the water and decrease the run off. The best use of this area is to plant more trees and shrubs - not pave over it.

**Ecology:** The Council's assessment is that development on this site would have - "No impact on environmentally sensitive areas" However, it is not clear what is meant by - "environmentally sensitive areas" in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. I am very familiar with this area and the trees on this piece of land and I believe the environmental impact has been played down massively. At a time when we should consider seriously the environmental impact of building on green spaces. Even if you leave the trees where do the birds, wildlife eat, gather insects, wild flowers grow. This area is a pleasant break between the repetitive, bland housing developments that have been built that do not in any way shape or form respect the original built environment in Northowram. Building houses here will block wildlife corridors and a place for birds/mammals to roost/live and eat.

**Historic Environment:** I am astounded that the Council's assessment is that there would be - "No impact on ANY heritage asset" Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. I suggest that the council read the historical areas of Northowram book.

**Accessibility:** I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport.

**Open Space:** I disagree with the Council's assessment that development of this site would have - "no loss" or - "no impact" on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. I attend the riding stables opposite this plot of land and this is a wonderful open space that is peaceful and full of wildlife in the surrounding trees. It really does provide a

break of houses in what feels like an already congested Northowram whereby brand new houses (less than 20 years old) severely out weighs the original houses in the village. The history is slowly being stripped away and all that will be left is a bunch of boring Permission homes with no character or redeeming features. Those open spaces that are necessary to retain the draw and benefits of Northowram and create a visual breath will be lost. Other : I disagree with the Council's description of this site as being - "surrounded on three sides by residential development" This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. I have to also add that even looking at the satellite images on the area its pretty clear that the site is no way surrounded by residential development at all. One side is a small riding stables with a field, the other side looks onto fields and Marsh Hall - hardly residential.

Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. These areas in Northowram and Shelf will not cope with the increased housing numbers. They rely on old, narrow, country roads, 'rat runs' will be created that take people past primary schools in the area. The pressure and change to the environment will be enormous. Green belt is there for a reason both from a visual perspective, historical and wildlife but we also must not down play the part our green spaces have on protecting the existing homes. Storms that we currently see at the moment, the torrents of rain require permeable ground to prevent the build up of water and flooding. Paving over all these areas will do damage that will eventually be seen with increasing flooding in the area. Bunny Green certainly won't cope. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU420**

Site ref (if applicable):

Person ID: **1242538**

Name: **Mrs Green**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

These are my comments for site LP0766 Land off Hall Lane Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [“To preserve the setting and Character of Historic Towns”]. The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have - “No impact on environmentally sensitive areas” However, it is not clear what is meant by - “environmentally sensitive areas” in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be - “No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have - “no loss” or - “no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being - “surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new

housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU422**

Site ref (if applicable): **LP0766**

Person ID: **1242538**

Name: **Mrs Green**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

These are my comments for site LP0766 Land off Hall Lane Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [‐ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that

development on this site would have - "No impact on environmentally sensitive areas" However, it is not clear what is meant by - "environmentally sensitive areas" in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be - "No impact on ANY heritage asset" Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have - "no loss" or - "no impact" on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being - "surrounded on three sides by residential development" This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU431**

Site ref (if applicable): **LP0766**

Person ID: **1128080**

Name: **Mrs Glenda Benner**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

These are my comments for site LP0766 Land off Hall Lane Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [‐To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have ‐No impact on environmentally sensitive areas‐ However, it is not clear what is meant by ‐environmentally sensitive areas‐ in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be ‐No impact on ANY heritage asset‐ Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have ‐no loss‐ or ‐no impact‐ on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being ‐surrounded on three sides by residential development‐ This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new

housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Comments:

Additional Evidence Link:

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Comment ID **HRU439**

Site ref (if applicable):

Person ID: **1121674**

Name: **Mr Stephen Owrid**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

These are my comments for site LP0766 Land off Hall Lane Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [‐ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that

development on this site would have - "No impact on environmentally sensitive areas" However, it is not clear what is meant by - "environmentally sensitive areas" in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be - "No impact on ANY heritage asset" Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have - "no loss" or - "no impact" on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being - "surrounded on three sides by residential development" This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN.

Comments:

Additional Evidence Link:

Comment ID **HRU44**

Site ref (if applicable): **LP0766**

Person ID: **1093066**

Name: **Mrs Susan Crossley**

Organisation:

Agent ID:

Name:

Organisation:



Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

These are my comments for site LP0766 Land off Hall Lane Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [‐To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have ‐No impact on environmentally sensitive areas‐ However, it is not clear what is meant by ‐environmentally sensitive areas‐ in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be ‐No impact on ANY heritage asset‐ Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have ‐no loss‐ or ‐no impact‐ on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being ‐surrounded on three sides by residential development‐ This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new

housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

The site should be removed from the Local Plan

Comments:

Additional Evidence Link:

Comment ID **HRU448**

Site ref (if applicable):

Person ID: **1121674**

Name: **Mr Stephen Owrid**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

These are my comments for site LP0766 Land off Hall Lane Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt -“ To preserve the setting and Character of Historic Towns” . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not

clear what is meant by -“environmentally sensitive areas” in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be - “No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have - “no loss” or - “no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being - “surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN.

Comments:

Additional Evidence Link:

Comment ID **HRU451**

Site ref (if applicable): **LP0766**

Person ID: **1240792**

Name: **mrs susan thompson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

I Quote from Esther McVey, current Housing Minister's written policy on Green Belt land:- "My department is working with DEFRA (Department of Environment, Food & Rural Affairs) and Natural England on the once-in-a-generation Environment Bill which will establish a comprehensive legal framework for environmental improvement and make net gains for biodiversity mandatory for new development. Of course one of the most important environmental safeguards we have is the Green Belt. And I want to be clear that our commitment to this is as strong as ever, with any changes only happening in exceptional circumstances ; protecting the Green Belt goes beyond protection against development"- Exceptional circumstances in The Government White Paper-"Fixing our Broken Housing Market"- Parag 1.39 states that: The Government wants to retain the high bar to ensure the Green Belt remains protected, but we also wish to be transparent about what this means in practice so that local communities can hold their councils to account therefore we propose to amend and add to the National Policy to make it clear that: authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including :- making effective use of suitable brownfield sites and the opportunities offered by state regeneration :- - There has been no evidence of this and planners in Calderdale's Planning Department have stated several times -"Developers do not want to build on brownfield sites"- this is against government policy and does not constitute exceptional circumstances. I refer to the judicial review - Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council (2015) EWHC 1078 (Admin), Jay J - where Richard Turney appeared for the claimant "Mr Turney ... submitted that the fact that a particular site happens to be suitable for housing development cannot, without more, constitute an exceptional circumstance justifying an alteration of the Green Belt. I agree with Mr Turney insofar as this goes..Suitability simpliciter cannot logically be envisaged as an exceptional circumstances". I Quote from Esther McVey, current Housing Minister's written policy on Green Belt land:- "My department is working with DEFRA (Department of Environment, Food & Rural Affairs) and Natural England on the once-in-a-generation Environment Bill which will establish a comprehensive legal framework for environmental improvement and make net gains for biodiversity mandatory for new development. Of course one of the most important environmental safeguards we have is the Green Belt. And I want to be clear that our commitment to this is as strong as ever, with any changes only happening in exceptional circumstances ; protecting the Green Belt goes beyond protection against development"- Exceptional circumstances in The Government White Paper-"Fixing our Broken Housing Market"- Parag 1.39 states that: The Government wants to retain the high bar to ensure the Green Belt remains protected, but we also wish to be transparent about what this means in practice so that local communities can hold their councils to account therefore we propose to amend and add to the National Policy to make it clear that: authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including :- making effective use of suitable brownfield sites and the opportunities offered by state regeneration :- - There has been no evidence of this and planners in Calderdale's Planning Department have stated several times -"Developers do not want to build on brownfield sites"- this is against government policy and does not constitute exceptional circumstances. I refer to the judicial review - Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council (2015) EWHC 1078 (Admin), Jay J - where Richard Turney appeared for the claimant "Mr Turney ... submitted that the fact that a particular site happens to be suitable for housing development cannot, without more, constitute an exceptional circumstance justifying an alteration of the Green Belt. I agree with Mr Turney insofar as this goes..Suitability simpliciter cannot logically be envisaged as an exceptional circumstances". I Quote from Esther McVey, current Housing Minister's written policy on Green Belt land:- "My department is working with DEFRA (Department of Environment, Food & Rural Affairs) and Natural England on the once-in-a-generation Environment Bill which will establish a comprehensive legal

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Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [- "To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings

would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt.

**Highways:** I totally disagree with the council's statement that Hall Lane is suitable as an access point to this site. They state it does not flood. After moderate rain there are always huge pools of water from the snicket to beyond Bunney Green. Water pours through the stone walls onto the lane. This has increased steadily over the 40 years I have lived on Upper Lane. On Sunday 9<sup>th</sup> February this year Hall Lane was completely flooded and the road closed. This road is not suitable as an access to site LP0766. The potential 240 extra cars from this site alone will either have to use Hall Lane and either turn right to use the mini roundabout on Northowram Green or more likely turn left and add to the number of vehicles using the rat runs to Queensbury, Boothtown or Halifax. The Roundabout is right opposite the now closed down Yew Tree pub, which at this very moment is being converted into apartments and the car park developed into housing. At peak times, Northowram Green is already heavily congested especially at school pick up and drop off times so a development like LP0766, on top of the one that is already in progress would only worsen the situation and create a serious bottleneck at this mini roundabout. The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. School parking is already a nightmare. As it is almost impossible to park on Northowram Green near Baxter Lane at the start or end of school more and more parents are choosing to drop their children on the narrow part of Upper Lane at its junction with the footpath down Baxter Lane. The road is often impassable. Cars already park on the narrow pavement all along Upper Lane and this means wheel chairs and prams have to use the road. Speeding drivers trying to avoid the bottlenecks at Stump Cross are an accident waiting to happen. The vibrations from heavy traffic damage the fragile stone walls and I believe the council had to take liability to replace a section which bounds Northfield gate farm a couple of years ago. As the main road between Halifax and Bradford gets more and more congested it is obvious many of the new residents will join the huge numbers already using the rat run down Lands Head Lane to Kell Lane to access the A58 at Stump Cross. This route takes all the traffic through the protected Shibden Valley and past Salterlee School. Passing Salterlee near the start or end of school is already really difficult as it is a narrow lane and there is no on-site parking. At this time Kell Lane is reduced to a single track road. More worryingly Kell Lane is very narrow with a steep bank. It was shut recently for several months when the road collapsed. It cannot cope with the traffic that already uses it let alone more.

**Environmental Health:** Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination.

**Ecology:** The Council's assessment is that development on this site would have - "No impact on environmentally sensitive areas". However, it is not clear what is meant by - "environmentally sensitive areas" in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development.

**Historic Environment:** I am astounded that the Council's assessment is that there would be - "No impact on ANY heritage asset". Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm.

**Accessibility:** I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport.

**Open Space:** I disagree with the Council's assessment that development of this site would have - "no loss" or - "no impact" on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas.

**Other :** I disagree with the Council's description of this site as being - "surrounded on three sides by residential development". This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which

serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. This greenbelt site is widely used and enjoyed by many of the residents of Northowram who walk, push prams ,run, cycle or ride (horses) around the loop formed by Upper Lane, Lands Head Lane, Hall Lane, and the snicket between Hall Lane and Upper Lane bounded by the slab wall. They choose this route because of the beautiful open aspect. The whole village will lose a very valuable asset if it is turned into a housing estate. Northowram Puma's running club train on this route and the Northowram annual burner does three circuits.The huge amount of extra traffic these houses will generate will greatly affect the safety and attraction of using this route for these activities. There is an enormous spoil pile held back by a bulging retaining wall between little London and 114 Upper Lane. By looking at the amount of soil here it is obvious there are huge galleries and tunnels under the Hall lane site where this soil was removed. Presumably there was also a huge quantity of coal that was removed too or the mines would not have been viable. In addition, all the houses bordering the site along the length of Upper Lane right up to its junction with Lands Head Lane have septic tanks which discharge into this site via a network of underground drainage pipes and gullies. If these are filled in or disturbed it could lead to more potential flooding especially at Bunney Green where there is always a lake behind the cottages in wet weather. This site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. The sloping land bordering Upper Lane is clay based and when the soil can absorb no more water the excess runs on the top of the clay and again drain's into these pits. If these are removed all the properties on Upper Lane are liable to flood in the future as the water will have nowhere to go. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU457**

Site ref (if applicable): **LP0766**

Person ID: **1242617**

Name: **mr neil roddis**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

#### Legal Compliance Reason:

I Quote from Esther McVey, current Housing Minister's written policy on Green Belt land:- "My department is working with DEFRA (Department of Environment, Food & Rural Affairs) and Natural England on the once-in-a-generation Environment Bill which will establish a comprehensive legal framework for environmental improvement and make net gains for biodiversity mandatory for new development. Of course one of the most important environmental safeguards we have is the Green Belt. And I want to be clear that our commitment to this is as strong as ever, with any changes only happening in exceptional circumstances ; protecting the Green Belt goes beyond protection against development" - Exceptional circumstances in The Government White Paper- "Fixing our Broken Housing Market" - Parag 1.39 states that: The Government wants to retain the high bar to ensure the Green Belt remains protected, but we also wish to be transparent about what this means in practice so that local communities can hold their councils to account therefore we propose to amend and add to the National Policy to make it clear that: authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including :- making effective use of suitable brownfield sites and the opportunities offered by state regeneration :- - There has been no evidence of this and planners in Calderdale's Planning Department have stated several times - "Developers do not want to build on brownfield sites" - this is against government policy and does not constitute exceptional circumstances. I refer to the judicial review - Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council (2015) EWHC 1078 (Admin), Jay J - where Richard Turney appeared for the claimant "Mr Turney ... submitted that the fact that a particular site happens to be suitable for housing development cannot, without more, constitute an exceptional circumstance justifying an alteration of the Green Belt. I agree with Mr Turney insofar as this goes..Suitability simpliciter cannot logically be envisaged as an exceptional circumstances".

Do you consider the plan to be Sound?: **No**

#### Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [- "To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: I totally disagree with the council's statement that Hall Lane is suitable as an access point to this site. They state it does not flood. After moderate rain there are always huge pools of water from the snicket to beyond Bunney Green. Water pours through the stone walls onto the lane. This has increased steadily over the 40 years I have lived on Upper Lane. On Sunday 9<sup>th</sup> February this year Hall Lane was completely flooded and the road closed. This road is not suitable as an access to site LP0766 The potential 240 extra cars from this site alone will either have to use Hall Lane and either turn right to use the mini roundabout on Northowram Green or more likely turn left and add to the number of vehicles using the rat runs to Queensbury, Boothtown or Halifax. The Roundabout is right opposite the now closed down Yew Tree pub, which at this very moment is being converted into apartments and the car park developed into housing. At peak times, Northowram Green is already heavily congested especially at school pick up and drop off times so a development like LP0766, on top of the one that is already in progress would only worsen the situation and create a serious bottleneck at this mini roundabout. The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. School parking is already a nightmare. As it is almost impossible to park on Northowram Green near Baxter Lane at the start or end of school more and more parents are choosing to drop their children on the narrow part of Upper Lane at its junction with the footpath down Baxter Lane. The road is often impassable. Cars already park on the narrow pavement all along Upper Lane and this means wheel chairs



and prams have to use the road. Speeding drivers trying to avoid the bottlenecks at Stump Cross are an accident waiting to happen. The vibrations from heavy traffic damages the fragile stone walls and I believe the council had to take liability replace a section which bounds Northfield gate farm a couple of years ago As the main road between Halifax and Bradford gets more and more congested it is obvious many of the new residents will join the huge numbers already using the rat run down Lands Head Lane to Kell Lane to access the A58 at Stump Cross. This route takes all the traffic through the protected Shibden Valley and past Salterlee School. Passing Salterlee near the start or end of school is already really difficult as it is a narrow lane and there is no onsite parking. At this time Kell Lane is reduced to a single track road. More worryingly Kell lane is very narrow with a steep bank. It was shut recently for several months when the road collapsed. 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The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. This greenbelt site is widely used and enjoyed by many of the residents of Northowram who walk, push prams ,run, cycle or ride (horses) around the loop formed by Upper Lane, Lands Head Lane, Hall Lane, and the snicket between Hall Lane and Upper Lane bounded by the slab wall. They choose this route because of the beautiful open aspect. The whole village will lose a very valuable asset if it is turned into a housing estate. Northowram Puma's running club train on this route and the Northowram annual burner does three circuits.The huge amount of extra traffic these houses will generate will greatly affect the safety and attraction of using this route for these activities. There is an enormous spoil pile held back by a bulging retaining wall between little London and 114 Upper Lane. By looking at the amount of soil here it is obvious there are huge galleries and tunnels under the Hall lane site where this soil was removed. Presumably there was also a huge quantity of coal that was removed too or the mines would not have been viable. In addition, all the houses bordering the site along the length of Upper Lane right up to its junction with Lands Head Lane have septic tanks which discharge into this site via a network of

underground drainage pipes and gullies. If these are filled in or disturbed it could lead to more potential flooding especially at Bunney Green where there is always a lake behind the cottages in wet weather. This site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. The sloping land bordering Upper Lane is clay based and when the soil can absorb no more water the excess runs on the top of the clay and again drain's into these pits. If these are removed all the properties on Upper Lane are liable to flood in the future as the water will have nowhere to go. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU464**

Site ref (if applicable): **LP0766**

Person ID: **1242384**      Name: **Mrs Michelle Cranswick**      Organisation:

Agent ID:      Name:      Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National

Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” On Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

I believe this application should be removed from the Local Plan

Comments:

Additional Evidence Link:

Comment ID **HRU481**

Site ref (if applicable): **LP0766**

Person ID: **1242577**

Name: **Mrs Elaine 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:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder

being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

I believe that this site should be removed from the Local Plan.

Comments:

Additional Evidence Link:

Comment ID **HRU490**

Site ref (if applicable):

Person ID: **1124122**

Name: **Mr Robert Lamin**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-"To preserve the setting and Character of Historic Towns]. The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network

of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” On Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other: I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU511**

Site ref (if applicable):

Person ID: **1242760**

Name: **Mrs Tracey Harland**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

These are my comments for site LP0766 Land off Hall Lane Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-"To preserve the setting and Character of Historic Towns]. The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -"No impact on environmentally sensitive areas" However, it is not clear what is meant by -"environmentally sensitive areas" In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -"No impact on ANY heritage asset" Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -"no loss" or -"no impact" on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other: I disagree with the Council's description of this site as being -"surrounded on three sides by residential development" This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and

cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. The site should be removed from the Local Plan

Do you consider the plan to be Sound?: **No**

Sound Reason:

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU514**

Site ref (if applicable): **LP0766**

Person ID: **1124537**

Name: **Mrs Kim Hoyle**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees



and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -"No impact on ANY heritage asset"-Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -"no loss"-or -"no impact"-on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -"surrounded on three sides by residential development"-This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

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:

Comments:

Additional Evidence Link:

Comment ID **HRU535**

Site ref (if applicable):

Person ID: **1130217**

Name: **Mr Simon Warrington**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This

scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU543**

Site ref (if applicable): **LP0766**

Person ID: **1242977**

Name: **Mr Jean Shaw**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” in the context of

this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -"No impact on ANY heritage asset"-Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -"no loss"or -"no impact"on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -"surrounded on three sides by residential development"-This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU556**

Site ref (if applicable):

Person ID: **1242984**

Name: **Mrs Susan Hainsworth**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of

development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU56**

Site ref (if applicable):

Person ID: **1093075**

Name: **Mrs Alison Cooper**

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:

These are my comments for site LP0766 Land off Hall Lane Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial

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Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Keep our Green Belt! Redevelop brown belt sites

Comments:

Additional Evidence Link:

Comment ID **HRU569**

Site ref (if applicable): **LP0766**

Person ID: **1130510**

Name: **Mr Chris Hoesli**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

The latest additions to the Plan are not compliant with NPPF principles, notably: Should encourage the use of brownfield land - brownfield sites are being left out in lieu of easier green field site Should conserve heritage - development of siteLP0766 does not conserve heritage, see below. Should maximise the use of public transport , walking and cycling - Northowram and Shelf is the most poorly served PT, walking and cycling Ward in Calderdale.

Do you consider the plan to be Sound?: **No**

Sound Reason:

I don't believe the Local Plan to be sound as it contains an excessive amount of Green Belt, beyond that required. The growth assumptions the Authority has used are wholly unrealistic, resulting in an unnecessarily high requirement for housing units that require excessive amounts of green belt to be taken. This version of the Plan promotes sites on green belt before all brown field sites have been exhausted, for no other reason I can see than it being easier for the Council and more profitable for Developers. Funding is readily available from Homes England to bring forward brown field sites with a viability gap for this exact reason. The Council seem to have ignored this solution because it is easier for them to build out on green belt. The Inspector should consider the total number of unique objections received to this site throughout all consultation stages, not just the number in the consultation. The re-inclusion of this site has not been widely communicated, and many residents I have spoken to believe they have already objected and do not appreciate that the 're-advertising' of this site means they must again object. Highways The existing highway network is already in a dangerous condition due to the very large numbers of vehicles lining both side of the carriageway along a bus route - particularly along Newlands Grove and along Northowram Green from the Doctors surgery to the school. Please see attached photo showing typical traffic along Newlands. This is already dangerous for the current number of vehicles trying to access the village, along with the 681/682 buses which have to pass along this section. Any increase in traffic along this route will increase accidents and may likely lead to casualties, particularly given the large number of children who congregate in the morning and evenings to catch their school buses around Northowram Green. Hall Lane is also unsuitable and becomes very narrow on the corner adjacent to this site. Widening to increase suitability of either of these roads is not possible due to the large number of residential property acquisitions that would be required in order to make them safe. This is not practical/feasible or fair for a development of approximately 170 homes. Other routes into the village like Lydgate are already subject to traffic calming measures due to their current inadequacy. The Hough is already used as a rat run to avoid significant queuing experienced to Stump Cross. These queues stretch back into Northowram frequently and any additional growth in the ward is unsustainable given the high proportion of commuters who drive into Halifax at peak hours. One morning this week, there were 27 cars queuing up the Hough, who had 'rat run' through the village to avoid the traffic at Stump Cross. Similarly the queues at peak times from Shelf roundabout reach into Northowram on a daily basis. Any further development, particularly on the scale of this site, will considerably worsen the already inadequate infrastructure As highlighted in the site documentation there are no highways schemes planned within the Local Plan period that would improve any of the conditions described above. Highways England RIS is mentioned but of no relevance given the distance between this site and Strategic Road Network. In fact there is no infrastructure spend planned for this ward. The Inspector should interrogate why there is significant transport infrastructure spend c.£200m in the vicinity of Elland for example, is having nearly £200m invested in its transport infrastructure via three major highway projects and a new rail station, but has less proposed units than Northowram and Shelf where there is £0 planned infrastructure investment. Similarly Skircoat ward has just had £8.5m spent on highways infrastructure and it in walking distance of many other planned improvements but only has 36 units allocated in the plan. Sowerby Bridge is seeing a several million pound corridor improvement package and has a very good rail service, but only has 190 units allocated. The only Ward with higher housing numbers is Brighouse/Rastrick but this is getting £75m+ investment and also has



its own rail station. I can pick a similar example from almost every other Ward. Northowram and Shelf are being targeted because they are desirable places to live, meaning it will be easier for the Council to attract Developers to bring the site forward and not because they are the most appropriate sites. This is completely unacceptable. Calderdale Council are notorious for not requiring/not enforcing s106 contributions for developers and approving unsuitable planning applications simply to hit their required housing targets. There is only one narrow, uneven footpath leading to this site. As with the road, there is no room to increase this provision to an acceptable and safe level. Ecology The site is bordered on one side by mature trees covered under TPO. Some of these would be damaged or lost via development of this site. As would a number of the (non-protected) mature trees in and around the perimeter of this plot. Bats are known to roost in the trees on this site. I have also seen badgers within the boundaries of this site. Open Space This site is regularly used for horse events which would be a great loss to the fell and for the children and adults in Northowram and from much further afield from where people travel for these events. The traffic chaos seen when these events is held also substantiates the inappropriateness of this area for any development. Historic Environment The site assessment is inaccurate as it states the site is 'surrounded by developments on three sides.' This simply is not the case - there are a few listed and period properties around the site perimeter, with which a new development would not be remotely in keeping. There is a notable historic flag-on-edge retaining wall that runs immediately adjacent to this site. Other Factors The site assessment says this site is the least damaging for residential development in Northowram. This statement is completely untrue and needs to be re-visited by the planners based upon the comments through this consultation. Accessibility Covered in Highways section. Green Belt The loss of a green belt on this scale, in this locality would significantly and adversely effect the feel and dynamic of Northowram. Deliverability I am informed (although have not seen this) that in some of the Northowram sites - construction traffic is proposed to use The Hough. This is clearly ridiculous and whomever wrote this has never been up this road. The cobbled, curved and gradient of this mean it is certainly not suitable for construction traffic. I believe there may actually be a weight restriction on this road. Additional Information newlands.jpg (Size: 4,621.84K) Additional comments Although this is an objection to this site, I appreciate the hard work that has gone into creating the Local Plan. Commercially viable development sites in Calderdale can be difficult due to the Borough's topography and historic land uses. I understand the huge housing demand currently, and predicted in future years will require some loss of green belt to accommodate, but there are many much better suited sites that are not pursued due to politics. This is completely wrong and unacceptable for the Council to behave in this way. There are very few/no new housing sites proposed in Sowerby Bridge, Park or Skircoat wards. Similarly in the South of Halifax. The former of these all have a similar 'green' rural village feel but have no proposed sites which is unacceptable. All areas of the borough should share some of development burden within the Local Plan. Hipperholme has an abundance of developable sites and access to much better infrastructure than Northowram. Calderdale seem to have avoided any development in Hipperholme as they are unprepared to address the major problem on local infrastructure that is Hipperholme crossroads. If this was resolved it would unlock many more suitable sites that could remove the burden places like Northowram, Shelf and Brighouse. I have only undertaken a detailed review of sites in areas I am familiar with and able to accurately comment - Hipperholme, Lightcliffe, Coley, Norwood Green, Shibden, Northowram and Shelf. Given the above, this is the only site I am objecting to - I hope this illustrates the absolute unsuitability of this proposed site. I am a Civil Engineer and used to build houses for a local developer so my opinions are founded on industry knowledge. Development should be focused in areas where there is money being invested in infrastructure " i.e. Halifax town centre, Elland, Brighouse all of which have sites that could be used for residential development but are not used because they are deemed 'difficult'. Calderdale should, wherever possible develop all Brownfield sites no matter how difficult rather than taking the easier option which is removing green belt. If any of our elected ward members allow this site to move into the final Local Plan it will illustrate a complete and utter lack of understanding of the village and would suggest none of them would be fit for re-election to their seats. Alternative proposed use for this site. Green belt is the only appropriate designation for this site.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Not one other Calderdale resident I have spoken to has been made aware of the Local Plan process. Insufficient advertisement of this process has been undertaken to sufficiently inform residents to allow them to input to the proposals.

Suggested Modifications:

Removal of any further sites in Northowram.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5606067>

Comment ID **HRU570**

Site ref (if applicable): **LP0766**

Person ID: **1242992**

Name: **Mrs Susan Collins**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost

or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU577**

Site ref (if applicable): **LP0766**

Person ID: **1123214** Name: **Mrs Nicola Sheehan** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

These are my comments for site LP0766 Land off Hall Lane Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [“To preserve the setting and Character of Historic Towns”]. The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have - “No impact on environmentally sensitive areas” However, it is not clear what is meant by - “environmentally sensitive areas” in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be - “No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have - “no loss” or - “no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being - “surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure including schools and GP's. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of

brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THE SITE SHOULD REMAIN AS GREENBELT AND BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU595**

Site ref (if applicable): **LP0766**

Person ID: **717396**

Name: **Mrs Hoare**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

These are my comments for site LP0766 Land off Hall Lane Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial

fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be - "No impact on ANY heritage asset" Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have - "no loss" or - "no impact" on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being - "surrounded on three sides by residential development" This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU60**

Site ref (if applicable):

Person ID: **1241080**

Name: **Miss Kathryn Sugden**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

As part of the community I have not had one bit of information about this proposed site which will highly affect myself and neighbours..the site will be built right along side my home and I don't feel that I have any information about this proposed work.

Do you consider the plan to be Sound?: **No**

Sound Reason:

The infrastructure of this village simple can't take an extra 180 homes which will be family homes. The doctors and the area around there is already an accident waiting to happen jam packed with cars all day long, the main route through the village becomes a bolt neck and cars trying to squeeze past each other in an already full village. The school certainly doesn't have the capacity to take more children and is already over run with the cars at school drop off and pick up. The road that's been deemed ok for access is narrow and busy already. The said road used to access to have hospital grounds but when they houses where built that access was taken away and it was deemed not suitable for heavy traffic, another potential 180 cars will make the village unbearably busy and this road a nightmare.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU61**

Site ref (if applicable):

Person ID: **1241150**

Name: **Miss Emily Naylor**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-" To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:



Comment ID **HRU612**

Site ref (if applicable): **LP0766**

Person ID: **1117675**

Name: **Mr Peter Hoare**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

These are my comments for site LP0766 Land off Hall Lane Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [“To preserve the setting and Character of Historic Towns”]. The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have - “No impact on environmentally sensitive areas” However, it is not clear what is meant by - “environmentally sensitive areas” in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be - “No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have - “no loss” or - “no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being - “surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern

(and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU62**

Site ref (if applicable):

Person ID: **1241158**

Name: **Mr Jordan Dalby**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

These are my comments for site LP0766 Land off Hall Lane Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already

congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole.

**Environmental Health:** Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system.

**Ecology:** The Council's assessment is that development on this site would have - "No impact on environmentally sensitive areas" However, it is not clear what is meant by - "environmentally sensitive areas" In the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development.

**Historic Environment:** I am astounded that the Council's assessment is that there would be - "No impact on ANY heritage asset" Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm.

**Accessibility:** I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport.

**Open Space:** I disagree with the Council's assessment that development of this site would have - "no loss" Or - "no impact" On Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas.

**Other :** I disagree with the Council's description of this site as being - "surrounded on three sides by residential development" This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of the southern (and shortest) boundary is adjacent to a residential area but it is well separated from it by an established fringe of protected woodland which serves to remove the impact of the residential area. The eastern boundary has only about 50% of its length adjacent to residential but even here the impact is reduced by the established fringe of protected woodland and dense understorey. The remainder of the eastern boundary is adjacent to undeveloped 'Open Space Urban'. The western boundary has about 20% of its length adjacent to residential in the form of small, vernacular cottages in the green belt, the remainder being bounded by open fields and green belt. Once again, the small cottages are screened from the site by the established fringe of protected woodland.

**Additional Comments:** This site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities and local environment and cause unsustainable pressures on narrow local roads and other social infrastructure. Instead, the focus of development in Calderdale's Local Plan, should be on the regeneration of brownfield sites in sustainable town centres. I propose that the land remain as Green Belt. I have read the suggested comments for this proposed housing site prepared by the Shelf and Northowram Local Plan Forum and agree with them.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

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Comment ID **HRU632**

Site ref (if applicable): **LP0766**

Person ID: **1093075**

Name: **Mrs Alison Cooper**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore satisfies 4 of the 5 purposes of Green Belt. Highways: The Council's own assessment states that Upper Lane is not suitable to carry traffic generated by this site. Access and egress via Hall Lane will force traffic onto residential streets through the village which are already congested. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided, preventing an informed understanding of future problems, at this site and for the area as a whole. Environmental Health: Once again, the Council's site assessment is woefully lacking in detail and even knowledge of the area. It is well documented on Coal Authority and OS maps (National Library of Scotland) that there are up to 9 Coal Pits and mine openings spread across the whole site. Associated with these are spoil heaps and the potential for mine water contamination. In addition, all the houses bordering the site along Upper Lane have septic tanks which discharge into this site via a network of underground drainage pipes. Finally, the site frequently causes surface water flooding at Bunney Green and along Hall Lane which does not have an adequate surface water drainage system. Ecology: The Council's assessment is that development on this site would have -“No impact on environmentally sensitive areas” However, it is not clear what is meant by -“environmentally sensitive areas” in the context of this site. A site does not have to be environmentally sensitive to have an impact on ecology. This site is surrounded by a substantial fringe of mixed, deciduous woodland that is subject to two TPOs. These trees and associated understorey provide an essential habitat for birds, mammals and flora which would be lost or at risk due to development. Historic Environment: I am astounded that the Council's assessment is that there would be -“No impact on ANY heritage asset” Have they even been to look at the site? The southern site boundary is formed entirely by a GdII Slab Wall and across a narrow, open field to the north lies GdII\* Marsh Hall Farm. Accessibility: I disagree with some of the journey times shown in the Council's site assessment. The nearest bus service (533/534) does not meet the requirement of a frequent service. Journey times via the nearest frequent bus route are up to twice as long as those given by the Council so will force people to use less sustainable means of transport. Open Space: I disagree with the Council's assessment that development of this site would have -“no loss” or -“no impact” on Open Space. This site has been regularly used for horse trials and gymkhanas which would be a great loss to the community and for the children in Northowram and surrounding areas. Other : I disagree with the Council's description of this site as being -“surrounded on three sides by residential development” This is a gross exaggeration that seems deliberately intended to give the impression that the site is merely an 'infill' site. Only part of

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU641**

Site ref (if applicable): **LP0766**

Person ID: **1121443**

Name: **Mrs Christine Moussavi**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

Greenbelt: I disagree with the Council's Greenbelt assessment that the site does not fulfil Purpose IV of the five purposes of greenbelt [-“ To preserve the setting and Character of Historic Towns] . The site is bounded to the south by a listed building and there are unrestricted views across fields to the north to the nearby listed building of Marsh Hall. I believe the setting and significance of these two listed buildings would be significantly affected by development on this site so it DOES fulfil Purpose IV. The site therefore

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Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason: